

**EXHIBIT C**

*Valadez* Flat Fee Time Detail

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES  
ATTORNEY WORK PRODUCT  
PRIVILEGED AND CONFIDENTIAL

**Valadez Flat Fee Time Detail for April 5, 2023 - April 30, 2023**

**CLIENT:** 690970 LTL Management LLC  
**MATTER:** 8 Bankruptcy

NAME	DATE	HOURS	TASK	DESCRIPTION
1) Litigation Consulting				
BALZANO AJ	04/05/23	1.60	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTER DESIGNATIONS TO PLAINTIFF'S DEPOSITION DESIGNATIONS (1.6).
BALZANO AJ	04/05/23	0.50	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTER DESIGNATIONS TO PLAINTIFF'S WITNESS DEPOSITION DESIGNATIONS (0.5).
BERNARDO RT	04/05/23	0.20	1	(ANTHONY VALADEZ) CONDUCT FACTUAL RESEARCH IN SUPPORT OF TRIAL PREPARATION (0.2).
BROWN AM	04/05/23	0.50	1	(ANTHONY VALADEZ) CORRESPOND WITH COUNSEL AND COURT REGARDING ENTRY OF TRO BY BANKRUPTCY COURT (0.5).
CARUSO JA*	04/05/23	0.30	1	(ANTHONY VALADEZ) ATTEND INTERNAL CALL LEAD BY A. BROWN REGARDING UPCOMING VALADEZ TRIAL STATUS (0.3).
CARUSO JA*	04/05/23	3.30	1	(ANTHONY VALADEZ) REVIEW WITNESS'S DEPOSITIONS TO COUNTER AND OBJECT TO PLAINTIFF'S DESIGNATIONS (3.3).
COGSWELL S	04/05/23	1.90	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTERDESIGNATIONS FOR WITNESS TESTIMONY (1.9).
COGSWELL S	04/05/23	2.70	1	(ANTHONY VALADEZ) CONTINUE REVIEWING DEPOSITION DESIGNATIONS AND RELATED WITNESS TESTIMONY IN CONNECTION WITH DRAFTING OBJECTIONS AND COUNTERDESIGNATIONS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

EINSTEIN J *	04/05/23	2.60	1	(ANTHONY VALADEZ) REVIEW MEDICAL RECORDS IN SUPPORT OF TRIAL PREPARATIONS (2.6).
EINSTEIN J *	04/05/23	1.90	1	(ANTHONY VALADEZ) REVISE FACTUAL ANALYSIS IN SUPPORT OF TRIAL PREPARATIONS (1.9).
EINSTEIN J *	04/05/23	0.30	1	(ANTHONY VALADEZ) ATEND TRIAL TEAM CALL WITH A. BROWN, C. MULLALEY, A. BALZANO, S. MARTIN, J. CARUSO, AND OTHERS RE: CASE STATUS IN LIGHT OF BANKRUPTCY STAY (0.3).
LEIBOVITZ A	04/05/23	0.30	1	(ANTHONY VALADEZ) REVIEW RECENTLY FILED PLEADINGS AND CORRESPONDENCE (0.3).
LEIBOVITZ A	04/05/23	0.20	1	(ANTHONY VALADEZ) ATTEND TRIAL TEAM MEETING LED BY A. BROWN TO COORDINATE UPCOMING PROJECTS AND DEADLINES.
MARTIN SE	04/05/23	0.20	1	(ANTHONY VALADEZ) CALL WITH A. BROWN, C. MULLALEY AND OTHERS RE: CASE STATUS IN LIGHT OF BANKRUPTCY STAY (0.2).
MARTIN SE	04/05/23	0.60	1	(ANTHONY VALADEZ) CONFER WITH C. MULLALEY RE: UPDATES TO MASTER DEPOSITION SCHEDULE (0.6).
MARTIN SE	04/05/23	0.60	1	(ANTHONY VALADEZ) CORRESPONDENCE WITH LCI AND CORE LEGAL RE: STAY OF LITIGATION (0.6).
MARTIN SE	04/05/23	0.50	1	(ANTHONY VALADEZ) COMPILE DRAFT PLEADINGS FOR COUNTER-DESIGNATIONS AND OBJECTIONS TO PLAINTIFF'S DESIGNATIONS FOR FURTHER ATTORNEY REVIEW (0.5).
MARTIN SE	04/05/23	0.50	1	(ANTHONY VALADEZ) REVIEW CORRESPONDENCE TO AND FROM PLAINTIFF'S COUNSEL REGARDING DEPOSITION SCHEDULING (0.5).
SCHOCH JJ	04/05/23	0.40	1	(ANTHONY VALADEZ) CONFER WITH TRIAL TEAM RE: DESIGNATIONS AND TRIAL DEADLINES.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

SILVERSTEIN RA	04/05/23	4.00	1	(ANTHONY VALADEZ) DRAFT DEPOSITION COUNTERS AND OBJECTIONS FOR WITNESS (4.0).
BROWN AM	04/06/23	0.50	1	(ANTHONY VALADEZ) PREPARE FOR (0.1) AND PARTICIPATE IN (0.4) WEEKLY CASE MANAGEMENT CONFERENCE.
COX CD	04/13/23	0.60	1	(ANTHONY VALADEZ) CONFER WITH A. BROWN AND R. BERNARDO RE: DOCUMENT REQUEST (0.1) AND REVIEW TESTIMONY RE: SAME (0.5).
MCNULTY PA	04/13/23	0.70	1	(ANTHONY VALADEZ) REVIEW REQUEST FOR DOCUMENTS (0.1) DISCUSS SOURCE AND SEARCHES WITH C. TAGLIENTI (0.2) REVIEW INFORMATION AND DRAFT REQUEST TO CLIENTS RE: SAME (0.2) REVIEW CLIENT EXPORT FROM SAP RE: SAME (0.2).
TAGLIENTI CG	04/13/23	0.40	1	(ANTHONY VALADEZ) REVIEW REQUESTED DOCUMENTS (0.2) AND CONFER WITH P. MCNULTY AND CLIENTS RE: SAME (0.2).
TAGLIENTI CG	04/14/23	0.40	1	(ANTHONY VALADEZ) REVIEW PAYMENT DATA REQUESTED IN CONNECTION WITH WITNESS (0.4).
MCNULTY PA	04/17/23	1.00	1	(ANTHONY VALADEZ) REVIEW CLIENT EXPORTS FOR PAYMENTS TO HCP (0.5) TEL. CONF. WITH C. TAGLIENTI RE: ANALYSIS (0.3) TEL. CONFS. WITH P. DOWNS RE: IDENTIFICATION OF AND POSSIBLE COLLECTION OF CONTRACT RE: SAME (0.3).
TAGLIENTI CG	04/17/23	0.20	1	(ANTHONY VALADEZ) REVIEW EXPENSE SYSTEMS PAYMENT DATA FOR HCP AND CONFER WITH C. MULLALEY RE: SAME (0.2).
TAGLIENTI CG	04/17/23	0.40	1	(ANTHONY VALADEZ) CONFER WITH CLIENTS AND P. DOWNS RE: HCP CONTRACT FOR SPEAKING ENGAGEMENTS (0.4).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

TAGLIENTI CG	04/17/23	1.30	1	(ANTHONY VALADEZ) REVIEW PAYMENT DATA FOR HCP (0.9), CONFER WITH CLIENTS RE: SAME (0.4).
MCNULTY PA	04/18/23	1.30	1	(ANTHONY VALADEZ) REVIEW ADDITIONAL PAYMENT INFORMATION (0.4) TEL. CONF. WITH C. TAGLIENTI RE: SAME (0.3) TEL. CONF. WITH P. DOWN RE: SAME AND SEARCHES FOR CONTRACTS (0.3) REVIEW CONTRACT (0.3).
TAGLIENTI CG	04/18/23	0.60	1	(ANTHONY VALADEZ) REVIEW SOW IN CONNECTION WITH REQUEST RE: PAYMENTS TO HCP (0.3) AND CONFER WITH P. MCNULTY AND K. MULLALEY RE: SAME (0.3).
BALZANO AJ	04/20/23	4.60	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS (4.6).
BALZANO AJ	04/20/23	1.30	1	(ANTHONY VALADEZ) DRAFT DEPOSITION OUTLINE FOR EXPERT (1.3).
BALZANO AJ	04/20/23	2.10	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS OF COMPANY WITNESS (2.1).
BROWN AM	04/20/23	1.40	1	(ANTHONY VALADEZ) PREPARE THEMES FOR UPCOMING EXPERT DEPOSITIONS (1.4).
CARUSO JA*	04/20/23	3.40	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS FOR WITNESS (3.4).
CARUSO JA*	04/20/23	0.80	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS FOR WITNESS (0.8).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

COX CD	04/20/23	0.30	1	(ANTHONY VALADEZ) CONFER WITH R. BERNARDO AND A. BALZANO RE: OBJECTIONS AND COUNTER-DESIGNATIONS TO DEPOSITION TESTIMONY OF COMPANY WITNESS (0.3).
LEIBOVITZ A	04/20/23	0.20	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF WITNESS DEPOSITION DESIGNATIONS (0.2).
MULLALEY CI	04/20/23	3.30	1	(ANTHONY VALADEZ) CALL WITH B. KING (K&S) REGARDING JUDGE KAPLAN ORDER AND CASE MANAGEMENT CONFERENCE (0.6), CONFER WITH A. BALZANO, J. SCHOCH, R. SILVERSTEIN, S. COGSWELL, AND J. CARUSO REGARDING DEPOSITION DESIGNATIONS (0.4), DRAFT EXPERTS OBJECTIONS AND COUNTERS (2.3).
SCHOCH JJ	04/20/23	3.00	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTER DESIGNATIONS IN RESPONSE TO PLAINTIFFS' DESIGNATIONS.
WYATT GM	04/20/23	0.30	1	(ANTHONY VALADEZ) ANALYZE OBJECTIONS TO COMPANY WITNESS DESIGNATIONS (0.3).
BALZANO AJ	04/21/23	5.70	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS OF COMPANY WITNESS (5.7).
BALZANO AJ	04/21/23	4.50	1	(ANTHONY VALADEZ) DRAFT DEPOSITION OUTLINE FOR EXPERT (4.5).
BROWN AM	04/21/23	0.90	1	(ANTHONY VALADEZ) CONFER INTERNALLY REGARDING STRATEGY FOR UPCOMING EXPERT DEPOSITIONS (0.9).
CARUSO JA*	04/21/23	0.50	1	(ANTHONY VALADEZ) REVISE DRAFT OF WITNESS DEPOSITION DESIGNATION COUNTERS AND OBJECTIONS (0.5).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

CARUSO JA*	04/21/23	3.70	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS FOR WITNESS (3.7).
COGSWELL S	04/21/23	0.20	1	(ANTHONY VALADEZ) REVIEW STATUS OF MEDICAL RECORDS COLLECTION AND UPDATE TEAM AFTER RECENT HEARING.
MARTIN SE	04/21/23	3.40	1	(ANTHONY VALADEZ) REVISE OBJECTIONS AND COUNTER- DESIGNATIONS FOR WITNESSES FOR FURTHER ATTORNEY REVIEW IN PREPARATION FOR FILING (2.8); FOLLOW UP CORRESPONDENCE WITH K. MULLALEY, J. SCHOCH AND A. BALZANO RE: SAME (0.6).
MARTIN SE	04/21/23	0.50	1	(ANTHONY VALADEZ) CONFER WITH R. SILVERSTEIN AND J. MORALES (CORE LEGAL) RE: REVISIONS TO WITNESS DESIGNATIONS (0.5).
MARTIN SE	04/21/23	0.40	1	(ANTHONY VALADEZ) CORRESPONDENCE WITH B. KING (KING & SPALDING) RE: REVISIONS TO J. DAVIDSON PRO HAC APPLICATION (0.4).
MULLALEY CI	04/21/23	8.30	1	(ANTHONY VALADEZ) CONFER WITH S. MARTIN AND B. KING REGARDING EXPERT DEPOSITIONS (0.6), CONFER WITH G. WYATT, A. BALZANO, J. SCHOCH, R. SILVERSTEIN, J. CARUSO AND S. MARTIN RE: DEPOSITION DESIGNATIONS (1.2), REVIEW PLAINTIFF'S COMPANY WITNESS DESIGNATIONS (2.3), BEGIN TO DRAFT GENERAL OBJECTIONS TO COMPANY WITNESS DESIGNATIONS (2.4), CONTINUE DRAFTING OBJECTIONS AND COUNTERS TO OTHER COMPANY WITNESS DESIGNATIONS (1.8).
PARK J	04/21/23	2.40	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF SELECT DOCUMENTS CITED IN EXPERT DEPOSITION OUTLINE FOR FURTHER ATTORNEY REVIEW (2.4).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

SCHOCH JJ	04/21/23	5.10	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTER DESIGNATIONS IN RESPONSE TO PLAINTIFFS' DESIGNATIONS.
SILVERSTEIN RA	04/21/23	7.70	1	(ANTHONY VALADEZ) DRAFT DEPOSITION DESIGNATIONS FOR COMPANY WITNESS (7.7).
SILVERSTEIN RA	04/22/23	2.00	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS TO TRIAL DESIGNATIONS FOR COMPANY WITNESS (2.0).
SILVERSTEIN RA	04/22/23	2.40	1	(ANTHONY VALADEZ) DRAFT DEPOSITION DESIGNATIONS OBJECTIONS FOR COMPANY WITNESS (2.4).
BALZANO AJ	04/23/23	3.50	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS OF WITNESS (3.5).
DAVIDSON J	04/23/23	0.50	1	(ANTHONY VALADEZ) PREPARE FOR EXPERT DEPOSITION (0.5).
SILVERSTEIN RA	04/23/23	3.00	1	(ANTHONY VALADEZ) DRAFT DEPOSITION DESIGNATIONS OF COMPANY WITNESS DEPOSITIONS (3.0).
BALZANO AJ	04/24/23	7.70	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS OF COMPANY WITNESS (7.7).
BALZANO AJ	04/24/23	2.00	1	(ANTHONY VALADEZ) DRAFT DEPOSITION OUTLINE FOR EXPERT (2.0).
BROWN AM	04/24/23	0.60	1	(ANTHONY VALADEZ) REVIEW PLAINTIFF'S OPPOSITION TO MOTION TO COMPEL (0.4) AND CONFER WITH S.RICHMAN REGARDING THE SAME (0.2).



**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BROWN AM	04/24/23	2.20	1	(ANTHONY VALADEZ) PREPARE FOR (0.8) AND PARTICIPATE IN CONFERENCE CALL WITH NELSON MULLINS TEAM REGARDING TRIAL STRATEGY (1.1) AND FOLLOW UP CORRESPONDENCE WITH S.RICHMAN REGARDING THE SAME (0.3).
CARUSO JA*	04/24/23	2.90	1	(ANTHONY VALADEZ) RESEARCH AND DRAFT MEMO FOR C. MULLALEY ON ADMISSIBILITY OF PARTICULAR FACTUAL EVIDENCE.
CARUSO JA*	04/24/23	6.90	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS FOR WITNESS (6.9).
LEIBOVITZ A	04/24/23	0.70	1	(ANTHONY VALADEZ) REVIEW RECENTLY FILED PLEADINGS AND CORRESPONDENCE (0.7).
LOFFELMAN KL	04/24/23	0.90	1	(ANTHONY VALADEZ) EDIT J. DAVIDSON VERIFIED APPLICATION TO APPEAR AS COUNSEL PRO HAC VICE FOR JOHNSON & JOHNSON (0.9).
MARTIN SE	04/24/23	2.10	1	(ANTHONY VALADEZ) REVIEW CORRESPONDENCE TO AND FROM PLAINTIFF'S RE: DEPOSITION SCHEDULING (2.1).
MARTIN SE	04/24/23	0.80	1	(ANTHONY VALADEZ) CONFER WITH B. KING (K&S), K. LOFFELMAN AND R. HENSHAW RE: REVISIONS TO J. DAVIDSON PRO HAC APPLICATION (0.8).
MULLALEY CI	04/24/23	9.10	1	(ANTHONY VALADEZ) DRAFT EXPERT DEPOSITION OUTLINE (4.7), REVIEW PRIOR EXPERT TESTIMONY IN CONNECTION WITH PREPARATION FOR DEPOSITION (4.4).
SCHOCH JJ	04/24/23	10.10	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTER DESIGNATIONS IN RESPONSE TO PLAINTIFFS' DESIGNATIONS OF COMPANY WITNESS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	04/24/23	0.70	1	(ANTHONY VALADEZ) REVISE WITNESS DEPOSITION DESIGNATIONS (0.7) .
WYATT GM	04/24/23	2.30	1	(ANTHONY VALADEZ) REVISE THIRD PARTY WITNESS DEPOSITION DESIGNATIONS (2.3) .
BALZANO AJ	04/25/23	7.90	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS OF COMPANY WITNESS (7.9) .
BROWN AM	04/25/23	1.60	1	(ANTHONY VALADEZ) REVIEW PLAINTIFFS' OPPOSITION TO MOTION TO COMPEL (0.9) ; CONFER WITH NELSON MULLINS TEAM REGARDING THE SAME (0.7) .
BROWN AM	04/25/23	0.90	1	(ANTHONY VALADEZ) PREPARE FOR UPCOMING CASE MANAGEMENT CONFERENCE (0.9) .
CARUSO JA*	04/25/23	0.30	1	(ANTHONY VALADEZ) CONFER WITH J. EINSTEIN REGARDING RESEARCH ON THE ADMISSIBILITY OF CERTAIN FACTUAL INFORMATION (0.3) .
EINSTEIN J *	04/25/23	4.30	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS (4.3) .
EINSTEIN J *	04/25/23	5.20	1	(ANTHONY VALADEZ) RESEARCH ON ADMISSIBILITY OF PARTICULAR FACTUAL EVIDENCE (5.2) .
LEIBOVITZ A	04/25/23	3.40	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF PLAINTIFF EXPERT PRIOR KEY TESTIMONY AND OTHER DOCUMENTS FOR ATTORNEY REVIEW IN CONNECTION WITH ONGOING PRETRIAL DISCOVERY AND HEARINGS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

LEIBOVITZ A	04/25/23	3.80	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF DEFENSE EXPERT PRIOR KEY TESTIMONY AND OTHER DOCUMENTS FOR ATTORNEY REVIEW IN CONNECTION WITH ONGOING PRETRIAL DISCOVERY AND HEARINGS.
LEIBOVITZ A	04/25/23	0.80	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF DRAFT DEFENSE EXHIBIT LIST (0.8).
LEIBOVITZ A	04/25/23	0.20	1	(ANTHONY VALADEZ) REVIEW RECENTLY FILED PLEADINGS AND CORRESPONDENCE (0.2).
MARTIN SE	04/25/23	0.80	1	(ANTHONY VALADEZ) REVISE APPLICATION OF J. DAVIDSON FOR ADMISSION PRO HAC VICE IN CALIFORNIA IN PREPARATION FOR FILING (0.6); CONFER WITH B. KING (K&S), K. LOFFELMAN, AND R. HENSHAW RE: SAME (0.2).
MARTIN SE	04/25/23	3.10	1	(ANTHONY VALADEZ) REVISE COUNTER-DESIGNATIONS AND OBJECTIONS TO PLAINTIFF'S DESIGNATIONS OF COMPANY WITNESSES FOR FURTHER ATTORNEY REVIEW (3.1).
MULLALEY CI	04/25/23	7.70	1	(ANTHONY VALADEZ) DRAFT EXPERT DEPOSITION OUTLINE (4.6), REVIEW SAME EXPERT'S REPORTS AND OTHER MATERIALS IN PREPARATION FOR HIS DEPOSITION (3.1).
SCHOCH JJ	04/25/23	0.40	1	(ANTHONY VALADEZ) CONFER INTERNALLY RE: OBJECTIONS AND COUNTER DESIGNATIONS IN RESPONSE TO PLAINTIFFS' DESIGNATIONS.
SCHOCH JJ	04/25/23	3.60	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTER DESIGNATIONS IN RESPONSE TO PLAINTIFFS' DESIGNATIONS OF COMPANY WITNESS.
SILVERSTEIN RA	04/25/23	0.70	1	(ANTHONY VALADEZ) REVISE TRIAL DESIGNATIONS FOR COMPANY WITNESS (0.7).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	04/25/23	1.10	1	(ANTHONY VALADEZ) REVISE THIRD PARTY WITNESS DEPOSITION DESIGNATIONS (1.1).
CARUSO JA*	04/26/23	0.30	1	(ANTHONY VALADEZ) CONFER WITH J. EINSTEIN REGARDING THE ADMISSIBILITY OF CERTAIN ACTUAL INFORMATION (0.3).
EINSTEIN J *	04/26/23	2.20	1	(ANTHONY VALADEZ) RESEARCH ON ADMISSIBILITY OF PARTICULAR FACTUAL EVIDENCE (2.2).
EINSTEIN J *	04/26/23	7.30	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS FOR COMPANY WITNESS (7.3).
LEIBOVITZ A	04/26/23	0.20	1	(ANTHONY VALADEZ) REVIEW RECENTLY FILED PLEADINGS AND CORRESPONDENCE (0.2).
LEIBOVITZ A	04/26/23	1.70	1	(ANTHONY VALADEZ) PREPARE KEY BRIEFING RE: VALADEZ'S MOTIONS FOR RELIEF FROM AUTOMATIC STAY FOR ATTORNEY REVIEW (1.4); CROSS-REFERENCE SAME AGAINST DOCKET (0.2); CONFER WITH K. MULLALEY AND S. MARTIN RE: SAME (0.1).
LEIBOVITZ A	04/26/23	5.30	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF RELIANCE MATERIALS OF EXPERT FOR ATTORNEY REVIEW IN CONNECTION WITH ONGOING PRETRIAL DISCOVERY (5.3).
MARTIN SE	04/26/23	0.40	1	(ANTHONY VALADEZ) CONFER WITH K. MULLALEY RE: PREPARATION FOR EXPERT DEPOSITION (0.4).
MARTIN SE	04/26/23	0.80	1	(ANTHONY VALADEZ) REVIEW CORRESPONDENCE FROM RETAILERS ENCLOSING PRODUCTION IN PREPARATION FOR PMQ DEPOSITION (0.7); FOLLOW UP CORRESPONDENCE WITH B. ESSIG (B&T) RE: SAME (0.1).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN SE	04/26/23	0.20	1	(ANTHONY VALADEZ) REVIEW CORRESPONDENCE FROM PLAINTIFF'S COUNSEL ENCLOSING RELIANCE MATERIALS FOR DEPOSITION OF EXPERT (0.2).
MARTIN SE	04/26/23	0.20	1	(ANTHONY VALADEZ) CONFER WITH J. EINSTEIN RE: OBJECTIONS AND COUNTER-DESIGNATIONS TO PLAINTIFF'S COMPANY WITNESS DESIGNATIONS (0.2).
MARTIN SE	04/26/23	1.80	1	(ANTHONY VALADEZ) REVISE COUNTER DESIGNATIONS AND OBJECTIONS TO COMPANY WITNESSES FOR FURTHER ATTORNEY REVIEW (1.6); FOLLOW UP CORRESPONDENCE WITH J. MORALES RE: SAME (0.2).
MARTIN SE	04/26/23	1.40	1	(ANTHONY VALADEZ) REVIEW CORRESPONDENCE TO AND FROM PLAINTIFF'S RE: DEPOSITION SCHEDULING (1.2); FOLLOW UP CORRESPONDENCE WITH K. MULLALEY RE: SAME (0.2).
MULLALEY CI	04/26/23	12.70	1	(ANTHONY VALADEZ) REVISE EXPERT DEPOSITION OUTLINE (4.4), PREPARE FOR EXPERT DEPOSITION (6.9), CONFER WITH A. BROWN AND S. MARTIN RE: STATUS OF DEPOSITIONS AND OUTSTANDING WORK AHEAD OF CMC (1.4).
SCHOCH JJ	04/26/23	0.20	1	(ANTHONY VALADEZ) CONFER INTERNALLY RE: OBJECTIONS AND COUNTER DESIGNATIONS IN RESPONSE TO PLAINTIFFS' DESIGNATIONS.
SILVERSTEIN RA	04/26/23	0.20	1	(ANTHONY VALADEZ) CIRCULATE COMPANY WITNESS DEPOSITION DESIGNATION OBJECTIONS WITH COMMENTS (0.2).
SILVERSTEIN RA	04/26/23	1.40	1	(ANTHONY VALADEZ) REVISE COMPANY WITNESS DEPOSITION DESIGNATIONS (1.4).
SILVERSTEIN RA	04/26/23	1.70	1	(ANTHONY VALADEZ) REVISE TRIAL DESIGNATIONS FOR COMPANY WITNESS (1.7).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	04/26/23	1.10	1	(ANTHONY VALADEZ) REVISE OBJECTIONS TO DESIGNATIONS OF WITNESS (1.1).
BALZANO AJ	04/27/23	1.00	1	(ANTHONY VALADEZ) REVISE THE OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS OF COMPANY WITNESS (1.0).
BRADY PE*	04/27/23	3.90	1	(ANTHONY VALADEZ) REVIEW DOCUMENTS PRODUCED BY RETAILER IN PREPARATION FOR RETAILER PMQ DEPOSITION (3.9).
BROWN AM	04/27/23	1.50	1	(ANTHONY VALADEZ) PREPARE FOR (0.9) AND PARTICIPATE IN CASE MANAGEMENT CONFERENCE (0.6).
EINSTEIN J *	04/27/23	7.80	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS FOR COMPANY WITNESS (7.8).
EINSTEIN J *	04/27/23	0.20	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS FOR THIRD PARTY WITNESS (0.2).
KARP AM	04/27/23	1.80	1	(ANTHONY VALADEZ) CONFER WITH C. MULLALEY IN PREPARATION FOR DEPOSITION OF RETAILER CORPORATE REPRESENTATIVE (1.8).
LEIBOVITZ A	04/27/23	4.10	1	(ANTHONY VALADEZ) ASSIST WITH CONTINUING PREPARATION OF RELIANCE MATERIALS OF EXPERT FOR ATTORNEY REVIEW IN CONNECTION WITH ONGOING PRETRIAL DISCOVERY (4.1).
LEIBOVITZ A	04/27/23	0.30	1	(ANTHONY VALADEZ) REVIEW RECENTLY FILED PLEADINGS AND CORRESPONDENCE (0.3).
LEIBOVITZ A	04/27/23	1.20	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF RELIANCE MATERIALS OF EXPERT FOR ATTORNEY REVIEW IN CONNECTION WITH ONGOING PRETRIAL DISCOVERY (1.2).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN SE	04/27/23	1.20	1	(ANTHONY VALADEZ) REVIEW INCOMING PRODUCTION FROM RETAILER IN CONNECTION WITH DEPOSITION OF RETAILER PMQ (0.9); CORRESPONDENCE WITH P. BRADY AND K. MULLALEY RE: SAME (0.3).
MARTIN SE	04/27/23	0.50	1	(ANTHONY VALADEZ) REVISE SUMMARY OF COMPLETED DEPOSITIONS, DISCOVERY AND BRIEFING FOR FURTHER ATTORNEY REVIEW IN PREPARATION FOR CASE MANAGEMENT CONFERENCE WITH JUDGE SEABOLT (0.5).
MULLALEY CI	04/27/23	11.40	1	(ANTHONY VALADEZ) ATTEND EXPERT DEPOSITION (5.8), PREPARE FOR DODSON DEPOSITION (2.2), REVIEW RETAILER PRODUCTION IN CONNECTION WITH PMQ DEPOSITION (1.2), REVIEW COMPANY WITNESS DEPOSITION TESTIMONY IN CONNECTION WITH SAME (0.6), CALL WITH A. KARP RE: SAME (1.8).
SILVERSTEIN RA	04/27/23	0.20	1	(ANTHONY VALADEZ) COLLECT COMPANY WITNESS DEPOSITION DESIGNATION COUNTERS AND HIGHLIGHTED TESTIMONIES TO CIRCULATE WITH CO-COUNSEL (0.2).
WYATT GM	04/27/23	1.60	1	(ANTHONY VALADEZ) REVISE OBJECTIONS TO DEPOSITION DESIGNATIONS RE: WITNESS (1.6).
BRADY PE*	04/28/23	0.40	1	(ANTHONY VALADEZ) REVIEW DOCUMENTS IN PREPARATION FOR DEPOSITION (0.4).
DAVIDSON J	04/28/23	1.00	1	(ANTHONY VALADEZ) PREPARE FOR EXPERT DEPOSITION (1.0).
EINSTEIN J *	04/28/23	1.70	1	(ANTHONY VALADEZ) RESEARCH ON ADMISSIBILITY OF PARTICULAR FACTUAL EVIDENCE (1.7).
EINSTEIN J *	04/28/23	2.00	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS FOR WITNESS (2.0).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

KARP AM	04/28/23	4.11	1	(ANTHONY VALADEZ) REVIEW OF TRANSCRIPT AND PRODUCED DOCUMENTS OF RETAILER CORPORATE REPRESENTATIVE.
KARP AM	04/28/23	0.29	1	(ANTHONY VALADEZ) CONFER WITH R. BERNARDO, C. COX AND C. MULLALEY REGARDING DEPOSITION OF RETAILER CORPORATE REPRESENTATIVE.
LEIBOVITZ A	04/28/23	0.10	1	(ANTHONY VALADEZ) REVIEW RECENTLY FILED PLEADINGS AND CORRESPONDENCE (0.1).
LEIBOVITZ A	04/28/23	0.50	1	(ANTHONY VALADEZ) ASSIST WITH FURTHER PREPARATION OF RELIANCE MATERIALS OF EXPERT FOR ATTORNEY REVIEW IN CONNECTION WITH ONGOING PRETRIAL DISCOVERY (0.5).
LEIBOVITZ A	04/28/23	2.90	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF KEY PRIOR TESTIMONY, EXPERT REPORTS, OUTLINES, INVOICES, GRAPHICS AND RELIANCE MATERIALS OF EXPERTS FOR ATTORNEY REVIEW IN CONNECTION WITH ONGOING PRETRIAL DISCOVERY AND HEARINGS.
LEIBOVITZ A	04/28/23	0.70	1	(ANTHONY VALADEZ) ASSIST WITH FURTHER PREPARATION OF RELIANCE MATERIALS OF EXPERT FOR ATTORNEY REVIEW IN CONNECTION WITH ONGOING PRETRIAL DISCOVERY (0.7).
MARTIN SE	04/28/23	1.20	1	(ANTHONY VALADEZ) REVIEW CORRESPONDENCE TO AND FROM PLAINTIFF'S RE: DEPOSITION SCHEDULING (1.2).
MULLALEY CI	04/28/23	6.70	1	(ANTHONY VALADEZ) ATTEND RETAILER PMQ DEPOSITION (5.0), EMAIL COMMUNICATIONS WITH R. BERNARDO, C. COX AND A. KARP REGARDING RETAILER PMQ TESTIMONY (1.6).
BALZANO AJ	04/29/23	1.40	1	(ANTHONY VALADEZ) REVISE EXPERT DEPOSITION OUTLINE (1.4).



**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

DAVIDSON J	04/29/23	0.60	1	(ANTHONY VALADEZ) REVISE EXPERT DEPOSITION OUTLINE (0.6) .
BALZANO AJ	04/30/23	0.90	1	(ANTHONY VALADEZ) CONDUCT FACTUAL RESEARCH IN SUPPORT OF TRIAL PREPARATION (0.9) .
BALZANO AJ	04/30/23	0.60	1	(ANTHONY VALADEZ) EDIT EXPERT DEPOSITION OUTLINE (0.6) .
DAVIDSON J	04/30/23	0.40	1	(ANTHONY VALADEZ) PREPARE FOR EXPERT DEPOSITION (0.4) .
LEIBOVITZ A	04/30/23	0.20	1	(ANTHONY VALADEZ) REVIEW RECENTLY FILED PLEADINGS AND CORRESPONDENCE (0.2) .
SILVERSTEIN RA	04/30/23	0.10	1	(ANTHONY VALADEZ) ANALYZE PAST DESIGNATIONS (0.1) .
WYATT GM	04/30/23	0.20	1	(ANTHONY VALADEZ) REVISE OBJECTIONS TO DEPOSITION DESIGNATIONS RE: COMPANY WITNESS (0.2) .
WYATT GM	04/30/23	0.70	1	(ANTHONY VALADEZ) REVISE OBJECTIONS TO DEPOSITION DESIGNATIONS RE: COMPANY WITNESS (0.7) .

\* Law clerks are law school graduates who are not presently admitted to practice.

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES  
ATTORNEY WORK PRODUCT  
PRIVILEGED AND CONFIDENTIAL

**Valadez Flat Fee Time Detail for May 1, 2023 - May 31, 2023**

**CLIENT:** 690970 LTL Management LLC  
**MATTER:** 8 Bankruptcy

NAME	DATE	HOURS	TASK	DESCRIPTION
1) Litigation Consulting				
BALZANO AJ	05/01/23	2.10	1	(ANTHONY VALADEZ) REVIEW MATERIALS FOR EXPERT CROSS.
BROWN AM	05/01/23	0.50	1	(ANTHONY VALADEZ) CONFERENCE CALL WITH K.MULLALEY AND S.RICHMAN REGARDING CASE STRATEGY.
BYLER KM	05/01/23	0.80	1	(ANTHONY VALADEZ) REVIEW RECORDS IN SUPPORT OF MOTION TO COMPEL.
CRUZ SN	05/01/23	1.20	1	(ANTHONY VALADEZ) ASSIST WITH LOADING DOCUMENT PRODUCTIONS INTO DATABASE.
DAVIDSON J	05/01/23	2.50	1	(ANTHONY VALADEZ) REVISE MOTIONS TO COMPEL (1.2); PREPARE FOR EXPERT DEPOSITION (1.3).
KARP AM	05/01/23	2.80	1	(ANTHONY VALADEZ) CONFER WITH R. BERNARDO AND C. COX RE: DEPOSITION PREPARATION.
LEIBOVITZ A	05/01/23	0.10	1	(ANTHONY VALADEZ) REVIEW RECENTLY FILED PLEADINGS AND CORRESPONDENCE.
LEIBOVITZ A	05/01/23	1.70	1	(ANTHONY VALADEZ) REVISE TRIAL EXHIBIT LIST.
MAHADEVAN V	05/01/23	0.30	1	(ANTHONY VALADEZ) CONFER WITH A. LEIBOVITZ, E. BENARDOS RE: MEDICAL RECORDS REVIEW.
MARTIN SE	05/01/23	0.60	1	(ANTHONY VALADEZ) REVIEW CORRESPONDENCE TO AND FROM PLAINTIFF'S RE: DEPOSITION SCHEDULING.
MARTIN SE	05/01/23	0.50	1	(ANTHONY VALADEZ) CALL WITH A. BROWN, S. RICHMAN (NELSON MULLINS) AND K. MULLALEY RE: TRIAL STRATEGY.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN ZW	05/01/23	6.80	1	(ANTHONY VALADEZ) DRAFT REPLY RE: MOTION TO COMPEL.
MULLALEY CI	05/01/23	3.90	1	(ANTHONY VALADEZ) CALL WITH NELSON MULLINS AND SKADDEN TRIAL TEAMS RE: TRIAL PREP (1.1); REVIEW STUDIES IN CONNECTION WITH MOTION TO COMPEL (1.2); CONFER WITH L. MCEVOY (NELSON MULLINS) RE: FACTUAL RESEARCH (0.7); CORRESPOND WITH S. MARTIN RE: REVIEW OF DOC PRODUCTIONS (0.9).
SCHWARTZ JM	05/01/23	0.20	1	(ANTHONY VALADEZ) PARTICIPATE ON CALL WITH C. WINSHIP RE: MOTION TO COMPEL.
SCHWARTZ JM	05/01/23	0.10	1	(ANTHONY VALADEZ) PARTICIPATE ON CALL WITH J. DAVIDSON RE: REPLY IN SUPPORT OF MOTION TO COMPEL.
SCHWARTZ JM	05/01/23	8.40	1	(ANTHONY VALADEZ) DRAFT REPLY IN SUPPORT OF MOTION TO COMPEL.
SCHWARTZ JM	05/01/23	1.60	1	(ANTHONY VALADEZ) REVIEW BRIEFING ON MOTION TO COMPEL IN CONNECTION WITH DRAFTING REPLY.
WINSHIP CJ*	05/01/23	3.60	1	(ANTHONY VALADEZ) RESEARCH CASE LAW RE: MOTION TO COMPEL (3.2); SUMMARIZE FINDINGS (0.4).
WINSHIP CJ*	05/01/23	0.80	1	(ANTHONY VALADEZ) REVIEW BRIEFING RE: MOTION TO COMPEL.
WINSHIP CJ*	05/01/23	0.40	1	(ANTHONY VALADEZ) REVIEW DOCUMENTS IN CONNECTION WITH EXPERT DEPOSITION.
WYATT GM	05/01/23	1.50	1	(ANTHONY VALADEZ) REVISE OBJECTIONS TO COMPANY WITNESS DEPOSITION DESIGNATIONS.
BAGGETTA B	05/02/23	1.20	1	(ANTHONY VALADEZ) REVISE REPLY IN SUPPORT OF MOTION TO COMPEL (1.2).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BAGGETTA B	05/02/23	1.10	1	(ANTHONY VALADEZ) FINALIZE REPLY IN SUPPORT OF MOTION TO COMPEL (1.1).
BROWN AM	05/02/23	3.50	1	(ANTHONY VALADEZ) PREPARE FOR UPCOMING EXPERT DEPOSITIONS (2.8) AND CONFER WITH J. MILLER AND K. MULLALEY RE: SAME (0.7).
CARUSO JA*	05/02/23	0.40	1	(ANTHONY VALADEZ) REVISE WITNESS DEPOSITION DESIGNATIONS.
CRUZ SN	05/02/23	0.50	1	(ANTHONY VALADEZ) ASSIST WITH CREATION OF CASE DOCUMENT DATABASE.
CRUZ SN	05/02/23	0.90	1	(ANTHONY VALADEZ) ASSIST WITH LOADING DOCUMENT PRODUCTIONS INTO DATABASE.
DAVIDSON J	05/02/23	4.00	1	(ANTHONY VALADEZ) PREPARE FOR (1.0) AND DEPOSE EXPERT (3.0).
DAVIDSON J	05/02/23	1.30	1	(ANTHONY VALADEZ) REVISE MOTIONS TO COMPEL.
EINSTEIN J *	05/02/23	8.40	1	(ANTHONY VALADEZ) REVISE DEPOSITION DESIGNATIONS.
EINSTEIN J *	05/02/23	0.10	1	(ANTHONY VALADEZ) CORRESPONDENCE WITH G. WYATT RE: COMPANY WITNESS DEPOSITION DESIGNATIONS.
EINSTEIN J *	05/02/23	0.60	1	(ANTHONY VALADEZ) SUMMARIZE FACTUAL TESTIMONY.
LEIBOVITZ A	05/02/23	5.10	1	(ANTHONY VALADEZ) DRAFT EXHIBIT LIST.
LOFFELMAN KL	05/02/23	2.60	1	(ANTHONY VALADEZ) EDIT REPLY IN SUPPORT OF MOTION TO COMPEL.
MAHADEVAN V	05/02/23	4.30	1	(ANTHONY VALADEZ) ASSIST WITH REVIEW OF MEDICAL RECORDS.
MARTIN SE	05/02/23	0.10	1	(ANTHONY VALADEZ) REVIEW PRIOR WITNESS TESTIMONY TO PREPARE FOR RETAILER DEPOSITION.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN SE	05/02/23	0.20	1	(ANTHONY VALADEZ) CORRESPONDENCE WITH T. KOESTER RE: DESIGNATIONS.
MARTIN SE	05/02/23	2.60	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF OBJECTIONS AND COUNTERS TO DEPOSITION DESIGNATIONS.
MARTIN SE	05/02/23	0.40	1	(ANTHONY VALADEZ) CORRESPONDENCE WITH V. MAHADEVAN RE: REVISIONS TO TRIAL EXHIBIT LIST.
MARTIN SE	05/02/23	0.40	1	(ANTHONY VALADEZ) REVIEW CORRESPONDENCE TO AND FROM PLAINTIFF'S COUNSEL.
MARTIN ZW	05/02/23	3.10	1	(ANTHONY VALADEZ) DRAFT REPLY IN SUPPORT OF MOTION TO COMPEL.
MULLALEY CI	05/02/23	1.40	1	(ANTHONY VALADEZ) CONFER WITH Z. MARTIN RE: MOTION TO COMPEL (0.4); REVIEW DOCUMENT PRODUCTION (0.8); CORRESPONDENCE WITH B. KING (K&S) RE: DEPOSITION COVERAGE (0.2).
SCHWARTZ JM	05/02/23	1.40	1	(ANTHONY VALADEZ) REVISE REPLY IN SUPPORT OF MOTION TO COMPEL.
SILVERSTEIN RA	05/02/23	0.20	1	(ANTHONY VALADEZ) SPEAK WITH CO-COUNSEL REGARDING REVISIONS TO COMPANY WITNESS DEPOSITION DESIGNATIONS.
WINSHIP CJ*	05/02/23	3.80	1	(ANTHONY VALADEZ) ASSIST WITH EXPERT DEPOSITION.
WINSHIP CJ*	05/02/23	0.50	1	(ANTHONY VALADEZ) CONFER WITH A. BALZANO RE: EXPERT DEPOSITION PREPARATION.
WYATT GM	05/02/23	3.40	1	(ANTHONY VALADEZ) REVISE OBJECTIONS TO COMPANY WITNESS DEPOSITION DESIGNATIONS.
WYATT GM	05/02/23	1.60	1	(ANTHONY VALADEZ) REVISE OBJECTIONS TO COMPANY WITNESS DEPOSITION DESIGNATIONS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BRIER A	05/03/23	2.00	1	(ANTHONY VALADEZ) REVIEW MATERIALS FOR MOTION TO COMPEL.
BROWN AM	05/03/23	3.50	1	(ANTHONY VALADEZ) REVIEW FACT BACKGROUND MATERIALS IN PREPARATION FOR TRIAL (3.1); CONFER WITH M. BROWN AND A. WHITE (J&J) RE: TRAIL PREPARATION (0.4).
COGSWELL S	05/03/23	0.10	1	(ANTHONY VALADEZ) REVIEW CORRESPONDENCE WITH A. BROWN AND K. MULLALEY RE: OUTLINE ASSIGNMENTS.
DAVIDSON J	05/03/23	1.20	1	(ANTHONY VALADEZ) REVISE MOTION TO COMPEL (0.8); PREPARE FOR ARGUMENT RE: SAME (0.4).
DAVIDSON J	05/03/23	1.30	1	(ANTHONY VALADEZ) ATTEND EXPERT CALLS.
EINSTEIN J *	05/03/23	1.50	1	(ANTHONY VALADEZ) REVISE COMPANY WITNESS DEPOSITION DESIGNATIONS.
EINSTEIN J *	05/03/23	1.90	1	(ANTHONY VALADEZ) REVISE COMPANY WITNESS DEPOSITION DESIGNATIONS.
EINSTEIN J *	05/03/23	3.50	1	(ANTHONY VALADEZ) CONDUCT FACTUAL RESEARCH IN SUPPORT OF TRIAL PREPARATION.
KARP AM	05/03/23	1.20	1	(ANTHONY VALADEZ) CONFER WITH D. HENDERSON (KENVUE) AND A. CHESTER (KENVUE) REGARDING CASE STRATEGY.
KARP AM	05/03/23	1.20	1	(ANTHONY VALADEZ) CONFER WITH D. HENDERSON (KENVUE) AND A. CHESTER (KENVUE) REGARDING RETAILER ISSUES.
LEIBOVITZ A	05/03/23	0.80	1	(ANTHONY VALADEZ) DRAFT TRIAL EXHIBIT LIST
				.
LEIBOVITZ A	05/03/23	0.20	1	(ANTHONY VALADEZ) REVIEW BRIEFING ON MOTIONS TO COMPEL.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

LEIBOVITZ A	05/03/23	0.70	1	(ANTHONY VALADEZ) ASSEMBLE PRIOR TESTIMONY FOR REVIEW.
LEIBOVITZ A	05/03/23	0.90	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION FOR EXPERT CROSS (0.7); CONFER WITH K. MULLALEY AND S. MARTIN RE: SAME (0.2).
LEIBOVITZ A	05/03/23	0.20	1	(ANTHONY VALADEZ) REVIEW RECENT KEY PLEADINGS.
MARTIN SE	05/03/23	8.20	1	(ANTHONY VALADEZ) CONFER WITH T. KOESTER, L. DOERING (J&J), AND K. STRAWBRIDGE (LCI) RE: TRIAL LOGISTICS (1.1); CONFER WITH G. WYATT AND K. MULLALEY RE: TRIAL PLAN (0.4); REVISE COMPANY WITNESS DEPOSITION DESIGNATIONS (3.7); REVIEW CORRESPONDENCE RE: DEPOSITION SCHEDULING (1.1); REVIEW RECENT KEY PLEADINGS (1.4); COORDINATE WITH A. LEIBOVITZ RE: TRIAL EXHIBIT LIST REVISIONS (0.5).
MULLALEY CI	05/03/23	11.70	1	(ANTHONY VALADEZ) ATTEND RETAILER DEPOSITION (4.1); REVISE OPENING SLIDES (3.2); ASSIST WITH PREPARATION OF DEPOSITION DESIGNATIONS (3.5); CONFER WITH S. MARTIN RE: TRIAL PLAN (0.9).
SILVERSTEIN RA	05/03/23	0.10	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF DEPOSITION DESIGNATIONS.
SILVERSTEIN RA	05/03/23	0.20	1	(ANTHONY VALADEZ) REVIEW REVISIONS TO COMPANY WITNESS DEPOSITION DESIGNATIONS.
WYATT GM	05/03/23	3.60	1	(ANTHONY VALADEZ) REVISE OBJECTIONS TO COMPANY WITNESS DEPOSITION DESIGNATIONS.
WYATT GM	05/03/23	0.20	1	(ANTHONY VALADEZ) COMMUNICATION WITH K. MULLALEY RE: DEPOSITION DESIGNATIONS FOR COMPANY WITNESS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	05/03/23	0.30	1	(ANTHONY VALADEZ) REVISE OBJECTIONS TO DEPOSITION DESIGNATIONS OF COMPANY WITNESS.
WYATT GM	05/03/23	0.30	1	(ANTHONY VALADEZ) CONFER WITH S. MARTIN RE: STATUS OF DEPOSITION DESIGNATIONS.
BALZANO AJ	05/04/23	0.20	1	(ANTHONY VALADEZ) REVISE DEPOSITION DESIGNATIONS OF COMPANY WITNESS.
BALZANO AJ	05/04/23	1.70	1	(ANTHONY VALADEZ) ATTEND TRIAL TEAM CALL WITH A. BROWN, J. DAVIDSON, K. MULLALEY AND NELSON MULLINS.
BROWN AM	05/04/23	9.80	1	(ANTHONY VALADEZ) ATTEND EXPERT PREP MEETING (3.0); PARTICIPATE IN CASE MANAGEMENT CONFERENCE (2.6); COORDINATION WITH TEAM RE TRIAL STRATEGY (3.8); CONFER WITH CLIENTS RE: STRATEGY (0.4).
CARUSO JA*	05/04/23	2.20	1	(ANTHONY VALADEZ) CONFER WITH WITH TRIAL TEAM RE: TRIAL STRATEGY (1.7); FACTUAL RESEARCH FOR TRIAL (0.5).
COGSWELL S	05/04/23	4.70	1	(ANTHONY VALADEZ) REVIEW MEDICAL RECORDS (2.8); ASSIST WITH RECORDS COLLECTION (1.4); REVIEW FACTUAL RESEARCH (0.5).
COGSWELL S	05/04/23	0.30	1	(ANTHONY VALADEZ) MEET WITH A. BROWN, K. MULLALEY AND A. BALZANO RE: TRIAL PREPARATION.
COGSWELL S	05/04/23	1.50	1	(ANTHONY VALADEZ) MEET WITH A. BROWN AND M. BROWN (NELSON MULLINS) AND BROADER TRIAL TEAM RE: TRIAL PREPARATION.
DAVIDSON J	05/04/23	5.50	1	(ANTHONY VALADEZ) PREPARE FOR ARGUMENTS ON MOTIONS (1.8); ATTEND EXPERT DEPOSITION (2.0); ATTEND TRIAL TEAM CALL (1.7).



**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

EINSTEIN J *	05/04/23	4.20	1	(ANTHONY VALADEZ) REVISE DEPOSITION DESIGNATIONS FOR COMPANY WITNESS.
EINSTEIN J *	05/04/23	1.40	1	(ANTHONY VALADEZ) CORRESPOND WITH A. BROWN, J. DAVIDSON, C. MULLALEY, A. BALZANO, S. COGSWELL, J. CARUSO, S. MARTIN AND OTHERS RE: TRIAL PLAN.
EINSTEIN J *	05/04/23	4.80	1	(ANTHONY VALADEZ) CONDUCT FACTUAL RESEARCH IN SUPPORT OF TRIAL PREPARATION.
EINSTEIN J *	05/04/23	0.70	1	(ANTHONY VALADEZ) REVISE DEPOSITION DESIGNATIONS.
EINSTEIN J *	05/04/23	0.30	1	(ANTHONY VALADEZ) CORRESPOND WITH C. MULLALEY, A. BALZANO, S. COGSWELL, J. CARUSO, AND S. MARTIN RE: TRIAL PREPARATION.
KARP AM	05/04/23	0.40	1	(ANTHONY VALADEZ) CALL WITH S. MARTIN REGARDING COMPANY WITNESS PREP.
KARP AM	05/04/23	2.50	1	(ANTHONY VALADEZ) CONFER WITH D. HENDERSON (KENVUE), A. CHESTER (KENVUE) AND M. WALKER (SEDGWICK) RE: CASE ISSUES.
LEIBOVITZ A	05/04/23	7.30	1	(ANTHONY VALADEZ) REVISE TRIAL EXHIBIT LIST (2.7); ATTEND TRIAL TEAM CALL WITH A. BROWN (1.7); PREPARE MATERIALS IN CONNECTION WITH DRAFTING CROSS OUTLINES (1.8); REVIEW RECENT KEY PLEADINGS (1.1).
LOFFELMAN KL	05/04/23	0.30	1	(ANTHONY VALADEZ) REVIEW AS-FILED MOTIONS.
MAHADEVAN V	05/04/23	6.10	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF DOCUMENTS FOR WITNESS PREP.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN SE	05/04/23	8.30	1	(ANTHONY VALADEZ) CALL WITH NELSON MULLINS & K&S RE: TRIAL PREP (1.4); CONFER WITH V. MAHADEVAN RE: COMPILING DOCUMENTS FOR WITNESS PREP (2.0); CONFER WITH K. MULLALEY RE: PRETRIAL DEADLINES (0.3); CONFER WITH S. COGSWELL RE: MEDICAL RECORDS COLLECTION (0.8); COORDINATION WITH T. KOESTER (NELSON MULLINS) RE: TRIAL SITE LOGISTICS (2.3); ASSIST WITH EXPERT DEPOSITION PREP (1.5).
MULLALEY CI	05/04/23	4.20	1	(ANTHONY VALADEZ) RESEARCH FOR CROSS EXAMINATION OUTLINE.
MULLALEY CI	05/04/23	0.20	1	(ANTHONY VALADEZ) CALL WITH A. BALZANO, S. COGSWELL, J. CARUSO, J. EINSTEIN, AND S. MARTIN REGARDING TRIAL ASSIGNMENTS.
MULLALEY CI	05/04/23	1.40	1	(ANTHONY VALADEZ) CALL WITH A. BROWN, M. BROWN (NELSON MULLINS), S. RICHMAN (NELSON MULLINS), L. MCEVOY (NELSON MULLINS), J. DAVIDSON, B. KING (K&S), A. BALZANO, S. COGSWELL, J. CARUSO, J. EINSTEIN, AND S. MARTIN REGARDING TRIAL PREPARATION.
MULLALEY CI	05/04/23	3.80	1	(ANTHONY VALADEZ) REVIEW PRIOR TESTIMONY IN CONNECTION WITH DRAFTING EXPERT CROSS OUTLINE.
MULLALEY CI	05/04/23	1.20	1	(ANTHONY VALADEZ) DRAFT OPENING SLIDES.
MULLALEY CI	05/04/23	2.10	1	(ANTHONY VALADEZ) ATTEND RETAILER DEPOSITION.
SILVERSTEIN RA	05/04/23	0.30	1	(ANTHONY VALADEZ) REVIEW PRIOR OUTLINES IN CONNECTION WITH DRAFTING EXPERT CROSS.
SILVERSTEIN RA	05/04/23	0.20	1	(ANTHONY VALADEZ) REVIEW DRAFT OF DEPOSITION DESIGNATIONS FOR COMPANY WITNESS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

SILVERSTEIN RA	05/04/23	0.10	1	(ANTHONY VALADEZ) REVIEW CORRESPONDENCE IN CONNECTION WITH DRAFTING EXPERT CROSS OUTLINE.
SILVERSTEIN RA	05/04/23	0.40	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS OUTLINE.
WYATT GM	05/04/23	2.90	1	(ANTHONY VALADEZ) REVISE OBJECTIONS TO DEPOSITION DESIGNATIONS FOR COMPANY WITNESS.
WYATT GM	05/04/23	0.90	1	(ANTHONY VALADEZ) REVISE OBJECTIONS TO DEPOSITION DESIGNATIONS FOR COMPANY WITNESS.
BALZANO AJ	05/05/23	3.30	1	(ANTHONY VALADEZ) REVISE COUNTERS AND OBJECTIONS TO PLAINTIFF'S DEPOSITION DESIGNATIONS OF COMPANY WITNESS.
BERNARDO RT	05/05/23	0.20	1	(ANTHONY VALADEZ) CONFER WITH A. KARP RE: RETAILER TESTIMONY.
BROWN AM	05/05/23	4.00	1	(ANTHONY VALADEZ) PREPARE FOR MOTION IN LIMINE ARGUMENTS (1.5); REVISE OPENING (2.5).
COGSWELL S	05/05/23	6.70	1	(ANTHONY VALADEZ) ANALYSIS OF MEDICAL RECORDS AND RELATED PRIVILEGE LOGS (4.0); COORDINATE THE COLLECTION OF MEDICAL RECORDS (2.7).
DAVIDSON J	05/05/23	4.50	1	(ANTHONY VALADEZ) PREPARE FOR (1.4) AND DEFEND EXPERT DEPOSITION (3.1).
EINSTEIN J *	05/05/23	9.60	1	(ANTHONY VALADEZ) REVISE COMPANY WITNESS DEPOSITION DESIGNATIONS COUNTERS AND OBJECTIONS (8.7); REVISE COMPANY WITNESS DEPOSITION DESIGNATIONS (0.4); REVIEW FACTUAL RESEARCH REPORTS (0.2).
KARP AM	05/05/23	1.30	1	(ANTHONY VALADEZ) CONFER WITH S. SLADER (J&J) AND A. CHESTER (KENVUE) REGARDING RETAILER DEPOSITION.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

LEIBOVITZ A	05/05/23	7.80	1	(ANTHONY VALADEZ) DRAFT EXHIBIT LIST (4.2); COMPILE BACKGROUND MATERIAL FOR EXPERT OUTLINES (2.3); REVIEW PLAINTIFF'S MEDICAL RECORDS (1.3).
MAHADEVAN V	05/05/23	4.90	1	(ANTHONY VALADEZ) ASSIST WITH COMPILING DOCUMENTS FOR COMPANY WITNESS PREP (4.5); CONFER WITH S. MARTIN RE: SAME (0.4).
MARTIN SE	05/05/23	9.30	1	(ANTHONY VALADEZ) COORDINATE TRIAL LOGISTICS (1.6); CONFER WITH T. KOESTER (NELSON MULLINS) RE: SAME (0.6); CONFER WITH S. COGSWELL RE: MEDICAL RECORDS COLLECTION (2.1); CONFER WITH G. WYATT AND J. MORALES (CORE LEGAL) RE: PREPARATION OF COMPANY WITNESS DEPOSITION DESIGNATIONS (1.4); REVISE DEPOSITION DESIGNATIONS (2.4); DRAFT DECLARATIONS IN SUPPORT OF DEPOSITION DESIGNATIONS (1.2).
MULLALEY CI	05/05/23	6.20	1	(ANTHONY VALADEZ) REVISE EXPERT CROSS OUTLINE (3.6); CONDUCT FACTUAL RESEARCH RE: SAME (2.2); CONFER WITH R. SILVERSTEIN, A. BROWN AND B. KING (K&S) RE: EXPERT DESIGNATIONS (0.4).
SILVERSTEIN RA	05/05/23	0.10	1	(ANTHONY VALADEZ) CONFER WITH C. MULLALEY REGARDING PREPARATION OF EXPERT DEPOSITION DESIGNATIONS.
SILVERSTEIN RA	05/05/23	2.20	1	(ANTHONY VALADEZ) REVISE COMPANY WITNESS DEPOSITION DESIGNATIONS.
WYATT GM	05/05/23	2.60	1	(ANTHONY VALADEZ) REVISE OBJECTIONS TO DEPOSITION DESIGNATIONS OF COMPANY WITNESS.
WYATT GM	05/05/23	0.60	1	(ANTHONY VALADEZ) REVISE DEPOSITION DESIGNATIONS RE: COMPANY WITNESS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BALZANO AJ	05/06/23	3.50	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS OUTLINE.
BROWN AM	05/06/23	4.50	1	(ANTHONY VALADEZ) REVIEW MEDICAL RECORDS (2.0); REVIEW EXPERT DEPOSITION TRANSCRIPTS (1.1); CONFERENCE CALL WITH M. BROWN (NELSON MULINS) AND S. RICHMAN (NELSON MULLINS) RE: SAME (1.5).
COGSWELL S	05/06/23	6.00	1	(ANTHONY VALADEZ) ANALYSIS OF MEDICAL RECORDS AND RELATED PRIVILEGE LOGS (4.8); COORDINATE THE COLLECTION OF MEDICAL RECORDS (1.2).
EINSTEIN J *	05/06/23	5.70	1	(ANTHONY VALADEZ) REVISE DEPOSITION DESIGNATION COUNTERS AND OBJECTIONS FOR COMPANY WITNESS (2.9); REVISE DEPOSITION DESIGNATIONS FOR OTHER COMPANY WITNESS (2.3); RESEARCH IN SUPPORT OF TRIAL STRATEGY (0.5).
MAHADEVAN V	05/06/23	7.60	1	(ANTHONY VALADEZ) COMPILE VOLUMINOUS MATERIALS FOR WITNESS REVIEW (7.0); CONFER WITH S. MARTIN RE: SAME (0.6).
MARTIN SE	05/06/23	1.10	1	(ANTHONY VALADEZ) COORDINATE WITH A. BROWN, K. MULLALEY AND S. COGSWELL RE: STATUS OF MEDICAL RECORDS.
MULLALEY CI	05/06/23	6.70	1	(ANTHONY VALADEZ) CONFER WITH A. BROWN, S. COGSWELL, AND S. MARTIN RE: MEDICAL RECORDS (1.1), CONFER WITH G. WYATT RE: DEPOSITION DESIGNATIONS (1.3); REVISE COMPANY WITNESS DEPOSITION DESIGNATIONS (2.4); REVISE OPENING SLIDES (1.9).
SILVERSTEIN RA	05/06/23	5.10	1	(ANTHONY VALADEZ) REVISE COMPANY WITNESS DEPOSITION DESIGNATIONS.
BALZANO AJ	05/07/23	3.80	1	(ANTHONY VALADEZ) RESEARCH CASE LAW RE: MOTION TO COMPEL.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BALZANO AJ	05/07/23	1.80	1	(ANTHONY VALADEZ) RESEARCH CASE LAW RE: MOTION TO COMPEL.
COGSWELL S	05/07/23	7.20	1	(ANTHONY VALADEZ) REVIEW MEDICAL AND PATHOLOGY RECORDS.
EINSTEIN J *	05/07/23	5.10	1	(ANTHONY VALADEZ) REVIEW FACTUAL RESEARCH (0.9); ASSIST WITH PREPARATION RE: TRIAL TIME LIMITS (2.7); LEGAL RESEARCH RE MOTION IN LIMINE (1.5).
LEIBOVITZ A	05/07/23	3.30	1	(ANTHONY VALADEZ) ASSIST WITH COMPILING BACKGROUND RE: SIMILAR TRIALS (2.8); CORRESPONDENCE WITH K. MULLALEY RE: SAME (0.5).
MARTIN SE	05/07/23	7.20	1	(ANTHONY VALADEZ) REVISE OBJECTIONS AND COUNTER DESIGNATIONS TO PLAINTIFF'S DESIGNATIONS (5.2); CONFER WITH G. WYATT RE: SAME (0.2); COORDINATE WITH S. COGSWELL RE: MEDICAL RECORDS REQUESTS (0.4); COMPILE PRIOR TRIAL MATERIALS FOR ATTORNEY REVIEW (0.8); COMPILE BACKGROUND MATERIAL FOR DRAFTING MOTIONS IN LIMINE (0.6).
MULLALEY CI	05/07/23	5.80	1	(ANTHONY VALADEZ) CONFER WITH A. BROWN AND A. LEIBOVITZ RE: TIME LIMITS (0.8); CONFER WITH S. RICHMAN AND L. MCEVOY (NELSON MULLINS) RE: FACTUAL INVESTIGATION (0.6); DRAFT OPENING SLIDES (3.8); CONFER WITH A. BALZANO, S. COGSWELL, J. EINSTEIN, J. CARUSO AND R. SILVERSTEIN RE: PREPARATION OF OPENING SLIDES (0.6).
SILVERSTEIN RA	05/07/23	0.60	1	(ANTHONY VALADEZ) REVISE COMPANY WITNESS DEPOSITION DESIGNATIONS.
SILVERSTEIN RA	05/07/23	0.50	1	(ANTHONY VALADEZ) PREPARE OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS FOR COMPANY WITNESS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

SILVERSTEIN RA	05/07/23	0.10	1	(ANTHONY VALADEZ) REVIEW CORRESPONDENCE FROM C. MULLALEY REGARDING TRIAL.
SILVERSTEIN RA	05/07/23	0.70	1	(ANTHONY VALADEZ) CONDUCT FACTUAL RESEARCH FOR OPENING SLIDES.
WYATT GM	05/07/23	0.40	1	(ANTHONY VALADEZ) REVISE OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS FOR COMPANY WITNESS.
WYATT GM	05/07/23	0.50	1	(ANTHONY VALADEZ) REVISE OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS FOR COMPANY WITNESS.
WYATT GM	05/07/23	0.30	1	(ANTHONY VALADEZ) CONFER WITH A. BROWN AND A. BALZANO RE: RESEARCH FOR MOTION TO COMPEL.
WYATT GM	05/07/23	2.30	1	(ANTHONY VALADEZ) REVISE OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS FOR COMPANY WITNESS.
WYATT GM	05/07/23	0.30	1	(ANTHONY VALADEZ) REVISE OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS FOR COMPANY WITNESS.
BALZANO AJ	05/08/23	2.90	1	(ANTHONY VALADEZ) DRAFT OPENING SLIDES.
BALZANO AJ	05/08/23	8.80	1	(ANTHONY VALADEZ) REVISE COUNTERS AND OBJECTIONS TO PLAINTIFF'S TRIAL DESIGNATIONS OF THIRD PARTY WITNESS.
BALZANO AJ	05/08/23	0.90	1	(ANTHONY VALADEZ) REVIEW FACTUAL ANALYSIS FOR TRIAL.
BROWN AM	05/08/23	5.50	1	(ANTHONY VALADEZ) PREPARE FOR (2.5); AND PARTICIPATE IN HEARINGS ON MOTIONS IN LIMINE (3.0).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

CARUSO JA*	05/08/23	2.60	1	(ANTHONY VALADEZ) REVIEW EXPERT TESTIMONY FOR OPENING STATEMENTS.
COGSWELL S	05/08/23	7.30	1	(ANTHONY VALADEZ) REVIEW MEDICAL RECORDS (4.3); CONDUCT FACTUAL RESEARCH IN SUPPORT OF TRIAL PREPARATION(3.0).
DAVIDSON J	05/08/23	1.00	1	(ANTHONY VALADEZ) CONFER RE: OPENING SLIDES FOR TRIAL PREPARATION.
EINSTEIN J *	05/08/23	6.80	1	(ANTHONY VALADEZ) REVISE DEPOSITION DESIGNATIONS FOR COMPANY WITNESSES (3.6); RESEARCH RE: CROSS EXAMINATION SCOPE (0.7); RESEARCH RE: TIME LIMITS (2.5).
GALLAGHER P	05/08/23	0.40	1	(ANTHONY VALADEZ) PHONE CALL WITH J. SCHWARTZ AND A. KASPARIE RE: RESEARCH FOR MOTION IN LIMINE.
KARP AM	05/08/23	0.10	1	(ANTHONY VALADEZ) CONFER WITH A. BALZANO REGARDING REVISIONS TO EXHIBIT LIST.
KARP AM	05/08/23	0.50	1	(ANTHONY VALADEZ) CONFER WITH S. SLADER (J&J) REGARDING TRIAL ISSUES.
KASPARIE AJ	05/08/23	1.10	1	(ANTHONY VALADEZ) RESEARCH IN SUPPORT OF MOTION IN LIMINE.
KASPARIE AJ	05/08/23	0.30	1	(ANTHONY VALADEZ) CALL WITH J. SCHWARTZ AND P. GALLAGHER RE: EVIDENCE MATTERS.
LEIBOVITZ A	05/08/23	6.30	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF DEFENDANTS' EXHIBIT LIST (3.2) REVIEW PLAINTIFF'S MEDICAL RECORDS (1.6); COMPILE BACKGROUND MATERIAL TO ASSIST WITH CROSS OUTLINES (1.5).



**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN SE	05/08/23	9.90	1	(ANTHONY VALADEZ) REVISE COUNTER DESIGNATIONS AND OBJECTIONS TO PLAINTIFF'S DESIGNATIONS (5.4); COORDINATE WITH G. WYATT AND J. MORALES (CORE LEGAL) RE: SAME (0.6); CONFER WITH WITH T. KOESTER (NELSON MULLINS) RE: TRIAL LOGISTICS (1.1); CORRESPONDENCE WITH J. ROMANO (K&S) RE: FINALIZING DESIGNATIONS (0.4); PREPARE PRO HAC APPLICATION FOR G. WYATT (1.6); COORDINATE MEDICAL RECORD COLLECTION (0.8).
MULLALEY CI	05/08/23	11.60	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION FOR CASE MANAGEMENT CONFERENCE (1.7); RESEARCH IN SUPPORT OF MOTIONS IN LIMINE (1.3), CONFER WITH G. WYATT, S. MARTIN AND A. BALZANO RE: DEPOSITION DESIGNATIONS (0.8); REVIEW PLAINTIFF'S EXPERT DEPOSITION DESIGNATIONS (2.6); REVISE OPENING SLIDES (4.6); CONFER WITH A. BALZANO, R. SILVERSTEIN, S. COGSWELL RE: STATUS OF WITNESS OUTLINES (0.6).
SCHWARTZ JM	05/08/23	0.30	1	(ANTHONY VALADEZ) PARTICIPATE ON CALL WITH A. KASPARIE AND P. GALLAGHER RE: RESEARCH FOR MOTION IN LIMINE.
SCHWARTZ JM	05/08/23	0.40	1	(ANTHONY VALADEZ) PARTICIPATE ON CALL WITH G. WYATT RE: RESEARCH FOR MOTION IN LIMINE.
SILVERSTEIN RA	05/08/23	2.70	1	(ANTHONY VALADEZ) CONDUCT FACTUAL RESEARCH FOR OPENING SLIDES.
SILVERSTEIN RA	05/08/23	0.10	1	(ANTHONY VALADEZ) REVIEW CORRESPONDENCE WITH C. MULLALEY REGARDING DESIGNATIONS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

SILVERSTEIN RA	05/08/23	0.10	1	(ANTHONY VALADEZ) CONFER WITH C. MULLALEY RE: CROSS OUTLINES.
SILVERSTEIN RA	05/08/23	3.10	1	(ANTHONY VALADEZ) DRAFT CROSS OUTLINE FOR EXPERT.
SILVERSTEIN RA	05/08/23	0.10	1	(ANTHONY VALADEZ) CONFER WITH S. COGSWELL RE: PREPARATION OF OPENING SLIDES.
WYATT GM	05/08/23	5.40	1	(ANTHONY VALADEZ) REVISE OBJECTIONS TO DEPOSITION DESIGNATIONS FOR COMPANY WITNESS.
WYATT GM	05/08/23	0.60	1	(ANTHONY VALADEZ) COMMUNICATION WITH A. BROWN RE: TRIAL PLANNING.
WYATT GM	05/08/23	0.30	1	(ANTHONY VALADEZ) COMMUNICATION WITH J. SCHWARTZ RE: RESEARCH RE: EVIDENCE MATTERS.
WYATT GM	05/08/23	0.10	1	(ANTHONY VALADEZ) COMMUNICATION WITH A. BALZANO RE: REVISIONS TO COMPANY WITNESS DEPOSITION DESIGNATIONS.
WYATT GM	05/08/23	0.20	1	(ANTHONY VALADEZ) COMMUNICATION WITH S. MARTIN AND A. BOLZANO RE: FINALIZING OPPOSITION TO DEPOSITION DESIGNATIONS.
BAGGETTA B	05/09/23	0.50	1	(ANTHONY VALADEZ) RESEARCH OPPOSITION TO PLAINTIFF'S BENCH BRIEF (0.5).
BALZANO AJ	05/09/23	4.60	1	(ANTHONY VALADEZ) DRAFT OPENING SLIDES.
BALZANO AJ	05/09/23	1.30	1	(ANTHONY VALADEZ) ATTEND TRIAL TEAM CALL WITH A. BROWN, J. DAVIDSON, K. MULLALEY AND OTHERS.
BALZANO AJ	05/09/23	1.20	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BERNARDO RT	05/09/23	0.40	1	(ANTHONY VALADEZ) CONFER WITH A. BROWN AND A. KARP RE: TRIAL ISSUES.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BRADY PE*	05/09/23	4.00	1	(ANTHONY VALADEZ) REVIEW MATERIALS FOR BRIEF.
BROWN AM	05/09/23	11.00	1	(ANTHONY VALADEZ) CONFER WITH WILCOX TEAM RE: EXPERT WITNESS PREP (3.8); ATTEND TRIAL TEAM CALL WITH J. DAVISON, K. MULLALEY, A. BALZANO AND OTHERS (0.6); PREPARE FOR HEARING ON MOTIONS IN LIMINE (2.1); PARTICIPATE IN MOTION IN LIMINE HEARINGS (4.0); ATTENTION TO TRIAL ISSUES (0.5).
BYLER KM	05/09/23	3.60	1	(ANTHONY VALADEZ) REVIEW MATERIALS IN SUPPORT OF DRAFTING MOTION TO EXCLUDE.
CARUSO JA*	05/09/23	1.40	1	(ANTHONY VALADEZ) REVIEW EXPERT TESTIMONY FOR OPENING STATEMENTS.
COGSWELL S	05/09/23	8.70	1	(ANTHONY VALADEZ) ATTEND TEAM CALL RE: TRIAL PREP (0.6); REVIEW MEDICAL RECORDS (1.2); DISCUSS EXHIBIT LIST REVISIONS WITH C. MULLALEY AND S. MARTIN (0.8); CONDUCT FACTUAL RESEARCH FOR TRIAL (6.1).
DAVIDSON J	05/09/23	1.50	1	(ANTHONY VALADEZ) REVISE RESPONSE TO PLAINTIFF'S BRIEFING (0.9); ATTEND TEAM MEETING (0.6).
EINSTEIN J *	05/09/23	7.90	1	(ANTHONY VALADEZ) CONDUCT FACTUAL BACKGROUND RESEARCH FOR TRIAL (0.9); UPDATE FACTUAL MEMO FOR TRIAL (4.2); REVIEW ISSUES FOR TRIAL (2.8).
EINSTEIN J *	05/09/23	0.50	1	(ANTHONY VALADEZ) CALL WITH WITH A. BROWN, G. WYATT, S. RICHMAN, C. MULLALEY, A. BALZANO, B. KING, S. COGSWELL, S. MARTIN AND OTHERS RE: TRIAL PREPARATION.
GALLAGHER P	05/09/23	5.30	1	(ANTHONY VALADEZ) CONDUCT LEGAL RESEARCH IN CONNECTION WITH MOTION IN LIMINE.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

GALLAGHER P	05/09/23	1.50	1	(ANTHONY VALADEZ) SUMMARIZE LEGAL RESEARCH IN CONNECTION WITH MOTIONS IN LIMINE.
GALLAGHER P	05/09/23	1.10	1	(ANTHONY VALADEZ) REVIEW PRIOR BRIEFS IN CONNECTION WITH DRAFTING MOTIONS IN LIMINE.
KARP AM	05/09/23	2.80	1	(ANTHONY VALADEZ) REVIEW J&J COMPANY DOCUMENTS IN PREPARATION FOR TRIAL (2.2); CONFER WITH A. BROWN, L. ALEXANIAN, A. LEIBOVITZ REGARDING ANALYSIS OF SAME (0.6).
KARP AM	05/09/23	2.00	1	(ANTHONY VALADEZ) CONFER WITH A. BROWN, R. BERNARDO, C. MULLALEY, S. MARTIN, S. KO (B&T) AND N. NOUREDDINI (B&T) REGARDING RETAILER DEPOSITION.
KASPARIE AJ	05/09/23	2.30	1	(ANTHONY VALADEZ) RESEARCH FOR MOTION IN LIMINE.
KASPARIE AJ	05/09/23	1.50	1	(ANTHONY VALADEZ) CALL WITH SKADDEN AND NELSON MULLINS TEAM RE: CURRENT STATUS OF TRIAL PREP.
KASPARIE AJ	05/09/23	1.50	1	(ANTHONY VALADEZ) RESEARCH RE: TESTIMONY ISSUES.
KASPARIE AJ	05/09/23	2.90	1	(ANTHONY VALADEZ) DRAFT BENCH BRIEF.
LEIBOVITZ A	05/09/23	8.50	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF EXHIBIT LIST (4.2); PREPARE EXPERT MATERIALS FOR REVIEW IN CONNECTION WITH DRAFTING CROSS OUTLINES (2.1); REVIEW MEDICAL RECORDS (2.2).
MAHADEVAN V	05/09/23	3.20	1	(ANTHONY VALADEZ) COMPILE COMPANY DOCUMENTS FOR WITNESS PREP.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN SE	05/09/23	9.70	1	(ANTHONY VALADEZ) CONFER WITH K. MULLALEY AND VENDOR RE: TRIAL LOGISTICS (0.4); ATTEND MEETING WITH TRIAL TEAM (1.2); REVIEW PRIOR RULINGS ON KEY ISSUES IN PREPARATION FOR TRIAL (1.1); REVIEW MEDICAL RECORDS (1.3); MEET WITH A. LEIBOVITZ RE: TRIAL PREP (0.8); REVIEW COMPANY DOCUMENTS FOR WITNESS PREP (4.2); CORRESPONDENCE WITH K. MULLALEY RE: DEPOSITION CALENDAR (0.7).
MARTIN ZW	05/09/23	7.10	1	(ANTHONY VALADEZ) DRAFT BRIEF.
MULLALEY CI	05/09/23	12.30	1	(ANTHONY VALADEZ) CALL WITH A. BROWN, S. RICHMAN, M. BROWN, L. MCEVOY AND TRIAL TEAM RE: TRIAL PREPARATION (1.2), CALL WITH C. TEBEAU RE: OPENING SLIDES (0.5), REVISE OPENING SLIDES (8.2); EMAIL COMMUNICATIONS WITH S. MARTIN RE: DEPOSITION SCHEDULING (0.7); CONFER WITH A. BROWN RE: EXPERT DOCUMENTS (0.6); CONFER WITH A. BROWN AND A. KARP RE: TRIAL ISSUES (0.6); EMAIL COMMUNICATIONS RE: TRIAL TIME LIMITS (0.5).
SCHWARTZ JM	05/09/23	7.40	1	(ANTHONY VALADEZ) DRAFT RESPONSE TO PLAINTIFF'S TRIAL BRIEF.
SILVERSTEIN RA	05/09/23	1.50	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION FOR EXPERT CROSS.
SILVERSTEIN RA	05/09/23	3.40	1	(ANTHONY VALADEZ) RESEARCH CASE LAW FOR POTENTIAL MOTION.
TRANGLE AS	05/09/23	1.80	1	(ANTHONY VALADEZ) RESEARCH CASE LAW FOR MOTION TO EXCLUDE.
WYATT GM	05/09/23	1.40	1	(ANTHONY VALADEZ) CALL WITH TRIAL TEAM, INCLUDING A. BROWN, M. BROWN (NELSON MULLINS), K. MULLALEY AND OTHERS RE: NEXT STEPS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	05/09/23	0.20	1	(ANTHONY VALADEZ) ANALYZE RESEARCH RE: EVIDENCE MATTERS.
WYATT GM	05/09/23	0.20	1	(ANTHONY VALADEZ) COMMUNICATION WITH A. KASPARIE RE: BENCH BRIEF.
WYATT GM	05/09/23	0.40	1	(ANTHONY VALADEZ) COMMUNICATION WITH A. KASPARIE RE: RESEARCH TESTIMONY ISSUES.
WYATT GM	05/09/23	0.20	1	(ANTHONY VALADEZ) COMMUNICATION WITH P. GALLAGHER RE: RESEARCH FOR MOTION IN LIMINE.
WYATT GM	05/09/23	0.60	1	(ANTHONY VALADEZ) ANALYZE PLAINTIFFS' ARGUMENTS IN TRIAL BRIEF.
BAGGETTA B	05/10/23	1.00	1	(ANTHONY VALADEZ) REVISE BENCH BRIEF (1.0).
BAGGETTA B	05/10/23	1.10	1	(ANTHONY VALADEZ) FINALIZE RESPONSE TO PLAINTIFF'S TRIAL BRIEF (1.1).
BALZANO AJ	05/10/23	5.30	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BALZANO AJ	05/10/23	1.00	1	(ANTHONY VALADEZ) DRAFT CORRESPONDENCE TO PLAINTIFF'S COUNSEL.
BALZANO AJ	05/10/23	0.80	1	(ANTHONY VALADEZ) ATTEND INTERNAL TRIAL TEAM CALL WITH A. BROWN, K. MULLALEY AND OTHERS.
BALZANO AJ	05/10/23	0.90	1	(ANTHONY VALADEZ) REVISE OPENING SLIDES.
BERNARDO RT	05/10/23	0.80	1	(ANTHONY VALADEZ) CONFER WITH K. MULLALEY AND A. KARP RE TRIAL ISSUES.
BRADY PE*	05/10/23	1.30	1	(ANTHONY VALADEZ) REVIEW MATERIALS FOR BRIEF.
BROWN AM	05/10/23	4.00	1	(ANTHONY VALADEZ) REVISE OPENING STATEMENT (2.6); DRAFT STIPULATION FOR TRIAL (1.4).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BYLER KM	05/10/23	7.40	1	(ANTHONY VALADEZ) DRAFT MOTION TO EXCLUDE.
CARUSO JA*	05/10/23	3.70	1	(ANTHONY VALADEZ) REVIEW TESTIMONY FOR OPENING STATEMENTS.
COGSWELL S	05/10/23	6.70	1	(ANTHONY VALADEZ) REVIEW MEDICAL RECORDS (2.1); ATTEND INTERNAL TRIAL TEAM MEETING (1.0); FACTUAL RESEARCH FOR TRIAL (3.6).
DAVIDSON J	05/10/23	1.50	1	(ANTHONY VALADEZ) REVISE RESPONSE TO PLAINTIFF'S BRIEFING (0.7); CONFER WITH J. SCHWARTZ AND A. BROWN RE: BRIEFS AND TRIAL ISSUES (0.8).
EINSTEIN J *	05/10/23	10.50	1	(ANTHONY VALADEZ) REVIEW EXPERT MATERIALS IN PREPARATION FOR OPENING.
EINSTEIN J *	05/10/23	0.80	1	(ANTHONY VALADEZ) CORRESPOND WITH A. BROWN, G. WYATT, C. MULLALEY, A. BALZANO, S. COGSWELL, J. CARUSO, S. MARTIN AND OTHERS RE: VALADEZ TRIAL ASSIGNMENTS.
GALLAGHER P	05/10/23	3.70	1	(ANTHONY VALADEZ) CONDUCT LEGAL RESEARCH IN CONNECTION WITH MOTIONS IN LIMINE.
GALLAGHER P	05/10/23	1.30	1	(ANTHONY VALADEZ) REVIEW TRANSCRIPTS IN CONNECTION WITH REVISING MOTIONS IN LIMINE (1.1); COMMUNICATIONS WITH G. WYATT AND C. MULLALEY REGARDING THE SAME (0.2).
GALLAGHER P	05/10/23	0.60	1	(ANTHONY VALADEZ) REVIEW TRANSCRIPTS IN CONNECTION WITH REVISING MOTIONS IN LIMINE.
GALLAGHER P	05/10/23	2.80	1	(ANTHONY VALADEZ) DRAFT MOTIONS IN LIMINE.
GALLAGHER P	05/10/23	0.50	1	(ANTHONY VALADEZ) REVIEW PRIOR TESTIMONY IN CONNECTION WITH REVISING MOTIONS IN LIINE.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

GALLAGHER P	05/10/23	0.70	1	(ANTHONY VALADEZ) LEGAL RESEARCH RE: MOTIONS IN LIMINE.
GALLAGHER P	05/10/23	0.20	1	(ANTHONY VALADEZ) REVIEW BACKGROUND MATERIAL IN CONNECTION WITH REVISING MOTIONS IN LIMINE.
KARP AM	05/10/23	0.40	1	(ANTHONY VALADEZ) CONFER WITH G. WYATT AND C. MULLALEY REGARDING PLAINTIFF'S EXPERT.
KARP AM	05/10/23	3.70	1	(ANTHONY VALADEZ) CONFER WITH R. BERNARDO, A. BROWN, C. MULLALEY AND B KING (K&S) REGARDING TRIAL ISSUES.
KARP AM	05/10/23	1.40	1	(ANTHONY VALADEZ) CONFER WITH R. BERNARDO, A. BROWN, C. MULLALEY AND B KING (K&S) REGARDING RETAILER ISSUES.
KASPARIE AJ	05/10/23	1.40	1	(ANTHONY VALADEZ) REVISE BENCH BRIEF.
LEIBOVITZ A	05/10/23	10.50	1	(ANTHONY VALADEZ) DRAFT TRIAL EXHIBIT LIST (2.7); REVIEW DOCUMENTS IN CONNECTION WITH REVISING TRIAL EXHIBIT LIST (4.5); PREPARE EXPERT MATERIALS FOR REVIEW (2.0); REVIEW MEDICAL RECORDS (1.0); REVIEW INCOMING DEPOSITION TRANSCRIPTS (0.3).
LOFFELMAN KL	05/10/23	1.50	1	(ANTHONY VALADEZ) REVISE RESPONSE TO PLAINTIFF'S TRIAL BRIEF.
LOFFELMAN KL	05/10/23	1.30	1	(ANTHONY VALADEZ) REVISE BENCH BRIEF (0.9); DRAFT DECLARATION RE: SAME (0.4).



**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN SE	05/10/23	10.70	1	(ANTHONY VALADEZ) REVIEW PRIOR BRIEFING FOR MOTIONS IN LIMINE (2.2); ASSIST WITH PREPARATION OF RESPONSE TO PLAINTIFF'S TRIAL BRIEF (3.7); CORRESPONDENCE WITH P. GALLAGHER AND K. MULLALEY RE: SAME (0.5); CONFER WITH T. KOESTER (NELSON MULLINS) RE: TRIAL LOGISTICS (1.4); REVIEW COMPANY DOCUMENTS FOR USE IN OPENING (1.5); CONFER WITH B. KING (K&S) AND K. MULLALEY RE: DEPOSITION SCHEDULE (0.4); CALL WITH TRIAL TEAM, INCLUDING A. BROWN, K. MULLALEY AND OTHERS RE: PREPARATION FOR TRIAL (1.0).
MARTIN ZW	05/10/23	6.10	1	(ANTHONY VALADEZ) DRAFT MOTION TO EXCLUDE.
MARTIN ZW	05/10/23	1.90	1	(ANTHONY VALADEZ) LEGAL RESEARCH IN CONNECTION WITH MOTION TO EXCLUDE.
MCCARTHY SR	05/10/23	4.00	1	(ANTHONY VALADEZ) RESEARCH FOR MOTION IN LIMINE.
MULLALEY CI	05/10/23	11.90	1	(ANTHONY VALADEZ) DRAFT COUNTERS AND OBJECTIONS TO PLAINTIFF'S EXPERT DESIGNATIONS (3.4); CALL WITH R. BERNARDO AND A. KARP RE: TRIAL ISSUES (0.4); CALL WITH A. BROWN, G. WYATT, A. BALZANO, S. COGSWELL, AND J. EINSTEIN RE: TRIAL ASSIGNMENTS (0.9), REVIEW BENCH BRIEF (1.9); CALL WITH J. SCHWARTZ RE: PLAINTIFF'S TRIAL BRIEF (0.1); EMAIL COMMUNICATIONS WITH S. RICHMAN AND S. MARTIN RE: UPCOMING DEPOSITIONS (0.5); DRAFT OPENING SLIDES (4.7).
SCHWARTZ JM	05/10/23	2.60	1	(ANTHONY VALADEZ) REVISE RESPONSE TO PLAINTIFF'S TRIAL BRIEF.
SCHWARTZ JM	05/10/23	0.10	1	(ANTHONY VALADEZ) PARTICIPATE ON CALL WITH C. MULLALEY RE: TIME PROPOSAL FOR RESPONSE TO PLAINTIFF'S TRIAL BRIEF.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

SCHWARTZ JM	05/10/23	0.10	1	(ANTHONY VALADEZ) PARTICIPATE ON CALL WITH J. DAVIDSON RE: REVISIONS TO DRAFT RESPONSE TO PLAINTIFF'S TRIAL BRIEF.
SILVERSTEIN RA	05/10/23	0.30	1	(ANTHONY VALADEZ) DRAFT CROSS OUTLINE FOR EXPERT.
SILVERSTEIN RA	05/10/23	0.10	1	(ANTHONY VALADEZ) REVIEW BRIEF.
SILVERSTEIN RA	05/10/23	0.10	1	(ANTHONY VALADEZ) REVIEW EMAIL FROM Z. MARTIN REGARDING RESEARCH FOR VALADEZ BRIEF.
SILVERSTEIN RA	05/10/23	1.30	1	(ANTHONY VALADEZ) RESEARCH CASE LAW REGARDING EXPERTS.
SILVERSTEIN RA	05/10/23	3.40	1	(ANTHONY VALADEZ) RESEARCH CASE LAW REGARDING POTENTIAL MOTIONS.
TRANGLE AS	05/10/23	2.30	1	(ANTHONY VALADEZ) RESEARCH CASES FOR BRIEF.
WINSHIP CJ*	05/10/23	0.80	1	(ANTHONY VALADEZ) COORDINATE WITH S. COGSWELL RE: FACTUAL BACKGROUND RESEARCH FOR TRIAL.
WUAMETT ND	05/10/23	4.00	1	(ANTHONY VALADEZ) DRAFT SUPPLEMENTAL BRIEF RE MOTION TO EXCLUDE.
WYATT GM	05/10/23	0.60	1	(ANTHONY VALADEZ) ANALYZE RESEARCH RE: EVIDENCE MATTERS.
WYATT GM	05/10/23	1.30	1	(ANTHONY VALADEZ) REVISE TRIAL BRIEF.
WYATT GM	05/10/23	0.90	1	(ANTHONY VALADEZ) TRIAL TEAM MEETING WITH A. BROWN, K. MULLALEY AND OTHERS RE: ASSIGNMENTS.
WYATT GM	05/10/23	0.70	1	(ANTHONY VALADEZ) ANALYZE RESEARCH AND RECORD RE: POTENTIAL TRIAL BRIEF.
WYATT GM	05/10/23	1.10	1	(ANTHONY VALADEZ) ANALYZE PLAINTIFFS' ARGUMENTS IN TRIAL BRIEF IN SUPPORT OF RESPONSE.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	05/10/23	1.30	1	(ANTHONY VALADEZ) CONFER WITH N. WUAMETT RE: OUTLINE OF MOTION TO EXCLUDE.
WYATT GM	05/10/23	0.10	1	(ANTHONY VALADEZ) COMMUNICATION WITH A. BROWN AND R. SILVERSTEIN RE: POTENTIAL TRIAL BRIEF.
BALZANO AJ	05/11/23	5.40	1	(ANTHONY VALADEZ) RESEARCH RE VERDICT FORM.
BALZANO AJ	05/11/23	0.40	1	(ANTHONY VALADEZ) REVIEW DOCUMENTS FOR FACT ANALYSIS IN PREPARATION FOR TRIAL.
BALZANO AJ	05/11/23	1.20	1	(ANTHONY VALADEZ) DRAFT MOTION TO COMPEL.
BROWN AM	05/11/23	11.50	1	(ANTHONY VALADEZ) PREPARE FOR (2.3) AND PARTICIPATE IN CASE MANAGEMENT CONFERENCE (2.5); FOLLOW UP DISCUSSIONS WITH G. WYATT RE: LEGAL ISSUES RAISED (1.1); REVIEW EXPERT DEPOSITIONS (1.8); PREPARE FOR OPENING STATEMENTS (3.8).
BYLER KM	05/11/23	4.80	1	(ANTHONY VALADEZ) DRAFT MOTION TO EXCLUDE.
CARUSO JA*	05/11/23	2.70	1	(ANTHONY VALADEZ) REVIEW EXPERT TESTIMONY FOR OPENING STATEMENTS.
COGSWELL S	05/11/23	5.00	1	(ANTHONY VALADEZ) REVIEW MEDICAL RECORDS (2.3); DRAFT WITNESS LIST (2.7).
COGSWELL S	05/11/23	5.90	1	(ANTHONY VALADEZ) REVIEW STATUS OF MEDICAL RECORDS (1.1); RESEARCH IN SUPPORT OF MOTIONS IN LIMINE (1.4); PREPARE FOR CROSS OF EXPERT (3.4).
DAVIDSON J	05/11/23	0.30	1	(ANTHONY VALADEZ) REVIEW DAUBERT BRIEFS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

EINSTEIN J *	05/11/23	7.80	1	(ANTHONY VALADEZ) SUMMARIZE EXPERT TESTIMONY FOR TRIAL OUTLINES (1.1); ASSIST WITH DRAFT OF EXPERT CROSS OUTLINE (3.0); RESEARCH CASE LAW FOR MOTION TO COMPEL (2.7); ASSIST WITH FACTUAL BACKGROUND RESEARCH (1.0).
GALLAGHER P	05/11/23	0.70	1	(ANTHONY VALADEZ) LEGAL RESEARCH RE: MOTIONS IN LIMINE.
GALLAGHER P	05/11/23	0.60	1	(ANTHONY VALADEZ) REVIEW DOCUMENTS IN CONNECTION WITH MOTIONS IN LIMINE.
GALLAGHER P	05/11/23	4.00	1	(ANTHONY VALADEZ) REVISE DRAFT OF SUPPLEMENTAL BRIEFING RE MOTIONS IN LIMINE (3.8), AND CONFER WITH G. WYATT REGARDING THE SAME (0.2).
KARP AM	05/11/23	0.80	1	(ANTHONY VALADEZ) REVIEW DOCUMENTS IN CONNECTION WITH POSSIBLE ADDITION TO EXHIBIT LIST.
LEIBOVITZ A	05/11/23	11.00	1	(ANTHONY VALADEZ) REIVISE TRIAL EXHIBIT LIST (6.7); PREPARE EXPERT MATERIALS FOR FURTHER REVIEW IN CONNECTION WITH DRAFTING CROSSES (2.1); REVIEW RECENT KEY PLEADINGS (0.8); COORDINATE WITH S. MARTIN RE: KEY PROJECTS AND DEADLINES (1.4).
MARTIN SE	05/11/23	8.30	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF WITNESS LIST (1.2); ASSIST G. WYATT WITH PREPARATION FOR JURY INSTRUCTIONS ARGUMENT (3.1); REVISE DRAFT OF TRIAL EXHIBIT LIST (2.4); CORRESPONDENCE WITH K. MULLALEY RE: SAME (0.8); CORRESPONDENCE WITH TRIAL TEAM RE: TRIAL LOGISTICS (0.8).
MARTIN ZW	05/11/23	1.60	1	(ANTHONY VALADEZ) REVISE BRIEF.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN ZW	05/11/23	1.90	1	(ANTHONY VALADEZ) LEGAL RESEARCH RE: POTENTIAL TRIAL BRIEF.
MCCARTHY SR	05/11/23	1.40	1	(ANTHONY VALADEZ) RESEARCH CA CASE LAW FOR SUPPLEMENTAL TRIAL BRIEF.
MULLALEY CI	05/11/23	15.40	1	(ANTHONY VALADEZ) REVISE OBJECTIONS TO PLAINTIFF'S DEPOSITION DESIGNATIONS FOR EXPERT (5.2); DRAFT WITNESS LIST (1.3); COMMUNICATE WITH S. MARTIN, S. COGSWELL, B. KING (S&K) AND A. BROWN RE SAME (0.4); COMMUNICATE WITH A. BROWN, S. RICHMAN, G. WYATT AND B. KING (S&K) RE: DESIGNATIONST (0.5); DRAFT OPENING SLIDES (6.6), EMAIL COMMUNICATIONS WITH S. MARTIN, A. KARP AND A. LEIBOVITZ RE EXHIBIT LIST (0.8); EMAIL COMMUNICATIONS WITH A. BROWN RE: FACTUAL RESEARCH (0.6).
SCHWARTZ JM	05/11/23	4.60	1	(ANTHONY VALADEZ) EDIT MOTION TO EXCLUDE.
SCHWARTZ JM	05/11/23	4.60	1	(ANTHONY VALADEZ) REVISE MOTION TO EXCLUDE.
SILVERSTEIN RA	05/11/23	0.20	1	(ANTHONY VALADEZ) REVIEW CORRESPONDENCE AND PLEADINGS FROM PLAINTIFF'S COUNSEL.
SILVERSTEIN RA	05/11/23	0.30	1	(ANTHONY VALADEZ) SPEAK WITH A. BALZANO AND S. COGSWELL CONCERNING RESEARCH, CROSS OUTLINES AND WITNESS DESIGNATIONS.
WINSHIP CJ*	05/11/23	0.20	1	(ANTHONY VALADEZ) COORDINATE WITH S. COGSWELL CONCERNING FACTUAL RESEARCH.
WINSHIP CJ*	05/11/23	3.80	1	(ANTHONY VALADEZ) RESEARCH FACTUAL ISSUES FOR TRIAL.
WUAMETT ND	05/11/23	5.30	1	(ANTHONY VALADEZ) DRAFT SUPPLEMENTAL TRIAL BRIEF.
WYATT GM	05/11/23	0.20	1	(ANTHONY VALADEZ) REVISE DRAFT ORDER FOR TRIAL BRIEFS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	05/11/23	0.40	1	(ANTHONY VALADEZ) REVISE SUPPLEMENTAL TRIAL BRIEF.
WYATT GM	05/11/23	0.30	1	(ANTHONY VALADEZ) COMMUNICATION WITH Z. MARTIN RE: RESEARCH FOR POTENTIAL TRIAL BRIEF.
WYATT GM	05/11/23	2.50	1	(ANTHONY VALADEZ) ANALYZE PROPOSED JURY INSTRUCTIONS.
BAGGETTA B	05/12/23	0.80	1	(ANTHONY VALADEZ) FINALIZE SUPPLEMENTAL BRIEF IN SUPPORT OF MOTION IN LIMINE (0.8).
BAGGETTA B	05/12/23	1.10	1	(ANTHONY VALADEZ) FINALIZE MOTION TO COMPEL (1.1).
BAGGETTA B	05/12/23	1.80	1	(ANTHONY VALADEZ) REVISE MOTION (1.8).
BAGGETTA B	05/12/23	1.70	1	(ANTHONY VALADEZ) RESEARCH MOTION (1.7).
BALZANO AJ	05/12/23	7.40	1	(ANTHONY VALADEZ) DRAFT MOTION TO COMPEL.
BALZANO AJ	05/12/23	0.90	1	(ANTHONY VALADEZ) REVIEW COMPANY DOCUMENTS FOR OPENING SLIDES.
BALZANO AJ	05/12/23	4.30	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BALZANO AJ	05/12/23	1.20	1	(ANTHONY VALADEZ) REVIEW MATERIALS FOR EXHIBIT LIST.
BALZANO AJ	05/12/23	0.60	1	(ANTHONY VALADEZ) REVISE OPENING SLIDES.
BRIER A	05/12/23	3.00	1	(ANTHONY VALADEZ) REVISE MEMO IN SUPPORT OF MOTION TO COMPEL.
BRIER A	05/12/23	0.50	1	(ANTHONY VALADEZ) PREPARE EXHIBITS FOR MOTION TO COMPEL.
BRIER A	05/12/23	0.80	1	(ANTHONY VALADEZ) PREPARE EXHIBITS FOR MOTION TO EXCLUDE.
BRIER A	05/12/23	4.00	1	(ANTHONY VALADEZ) REVISE MEMO IN SUPPORT OF MOTION TO EXCLUDE.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BROWN AM	05/12/23	6.00	1	(ANTHONY VALADEZ) MEET WITH EXPERT FOR TRIAL (1.5); PREPARE FOR EXPERT CROSS (2.7); PREPARE FOR OPENING (1.8).
BYLER KM	05/12/23	5.50	1	(ANTHONY VALADEZ) REVISE MOTION TO EXCLUDE.
CARUSO JA*	05/12/23	0.60	1	(ANTHONY VALADEZ) MEET WITH K. MULLALEY AND J. EINSTEIN RE: TRIAL PREP.
COGSWELL S	05/12/23	6.50	1	(ANTHONY VALADEZ) REVIEW STATUS OF MEDICAL RECORDS (1.2); PREPARE EXPERT CROSS EXAMINATION OUTLINE (2.1); RESEARCH FACTUAL BACKGROUND ISSUES FOR TRIAL (3.2).
DAVIDSON J	05/12/23	3.50	1	(ANTHONY VALADEZ) REVISE DAUBERT BRIEFS.
EINSTEIN J *	05/12/23	16.60	1	(ANTHONY VALADEZ) RESEARCH CASE LAW RE: MOTION TO COMPEL (4.8); REVIEW MATERIALS IN CONNECTION WITH CROSS- EXAMINATION OUTLINES (11.8).
GALLAGHER P	05/12/23	3.00	1	(ANTHONY VALADEZ) CONDUCT LEGAL RESEARCH IN SUPPORT OF SUPPLEMENTAL BRIEFING (2.3), AND REVISE THE SAME (0.7).
GALLAGHER P	05/12/23	1.70	1	(ANTHONY VALADEZ) CONDUCT LEGAL RESEARCH IN CALIFORNIA RE: MOTION TO EXCLUDE.
KARP AM	05/12/23	1.60	1	(ANTHONY VALADEZ) REVISE MOTION IN LIMINE.
KARP AM	05/12/23	2.40	1	(ANTHONY VALADEZ) REVIEW DOCUMENTS IN CONNECTION WITH WITNESS PREP.
KARP AM	05/12/23	1.80	1	(ANTHONY VALADEZ) REVIEW DOCUMENTS IN CONNECTION WITH REVISIONS TO TRIAL EXHIBIT LIST.
KASPARIE AJ	05/12/23	0.20	1	(ANTHONY VALADEZ) REVIEW MATERIALS IN PREPARATION OF DRAFTING BENCH BRIEF.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

LEIBOVITZ A	05/12/23	11.60	1	(ANTHONY VALADEZ) REVISE TRIAL EXHIBIT LIST (5.8); PREPARE DOCUMENTS FOR EXHIBIT LIST EXCHANGE (3.1); COMPILE EXPERT MATERIALS FOR CROSS EXAMINATION OUTLINES (2.7).
LOFFELMAN KL	05/12/23	0.50	1	(ANTHONY VALADEZ) ASSIST WITH DRAFTING MEMO IN SUPPORT OF MOTION TO EXCLUDE.
LOFFELMAN KL	05/12/23	3.90	1	(ANTHONY VALADEZ) REVISE MOTION IN LIMINE (1.2); PREPARE EXHIBITS FOR SAME (2.7).
LOFFELMAN KL	05/12/23	0.20	1	(ANTHONY VALADEZ) ASSIST WITH DRAFTING MEMO IN SUPPORT OF MOTION TO COMPEL.
LOFFELMAN KL	05/12/23	4.90	1	(ANTHONY VALADEZ) REVISE MOTION TO EXCLUDE.
MARTIN SE	05/12/23	9.40	1	(ANTHONY VALADEZ) CONFER WITH K. MULLALEY AND A. LEIBOVITZ RE: REVISIONS TO TRIAL EXHIBIT LIST (1.1); CORRESPONDENCE WITH B. RITZERT (K&S) RE: ANALYSIS OF MEDICAL RECORDS (0.6); CONFER WITH K. LOFFELMAN AND B. BAGGETTA RE: PREPARATION OF MOTIONS TO BE FILED (2.4); ASSIST WITH FILING MOTIONS IN LIMINE AND TRIAL BRIEFS (1.4); REVISE OBJECTIONS AND COUNTERS TO PLAINTIFF'S DEPOSITION DESIGNATIONS (3.4); CALL WITH INTERNAL TEAM RE: REMAINING TASKS IN PREPARATION FOR TRIAL (0.5).
MARTIN ZW	05/12/23	0.10	1	(ANTHONY VALADEZ) DRAFT EMAIL MEMO SUMMARIZING KEY ISSUES FOR MOTION IN LIMINE.
MARTIN ZW	05/12/23	2.30	1	(ANTHONY VALADEZ) LEGAL RESEARCH RE: POTENTIAL TRIAL BRIEF.
MARTIN ZW	05/12/23	2.10	1	(ANTHONY VALADEZ) REVISE BRIEF.



**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MULLALEY CI	05/12/23	8.10	1	(ANTHONY VALADEZ) REVISE EXPERT DEPOSITION DESIGNATIONS (4.1); CONFER WITH G. WYATT RE: SAME (0.7); CONFER WITH G. WYATT AND A. KASPARIE RE: LEGAL RESEARCH REGARDING TESTIMONY (0.8); REVIEW SUPPLEMENTAL MILS (0.4) CONFER WITH G. WYATT AND N. WUAMETT RE: SUPPLEMENTAL MIL (0.3); COORDINATE WITH A. LEIBOVITZ RE: COMPILING MATERIALS FOR CROSS OUTLINES (0.5); COMMUNICATE WITH S. MARTIN RE: EXHIBITS FOR COURT (0.8); CONFER WITH S. COGSWELL RE: BACKGROUND FACTUAL RESEARCH (0.5).
SCHWARTZ JM	05/12/23	0.50	1	(ANTHONY VALADEZ) REVISE INTRODUCTION OF DRAFT MOTION TO EXCLUDE.
SILVERSTEIN RA	05/12/23	4.90	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS OUTLINE.
WINSHIP CJ*	05/12/23	2.40	1	(ANTHONY VALADEZ) DRAFT SUMMARY OF FACTUAL BACKGROUND RESEARCH.
WINSHIP CJ*	05/12/23	3.20	1	(ANTHONY VALADEZ) COMPLETE FACTUAL RESEARCH FOR TRIAL.
WYATT GM	05/12/23	2.60	1	(ANTHONY VALADEZ) REVISE SUPPLEMENTAL BRIEF FOR MOTION IN LIMINE.
WYATT GM	05/12/23	1.20	1	(ANTHONY VALADEZ) REVISE MOTION TO COMPEL.
WYATT GM	05/12/23	0.40	1	(ANTHONY VALADEZ) COMMUNICATION WITH PLAINTIFF'S COUNSEL RE: PROPOSED ORDER RE: MOTIONS IN LIMINE.
WYATT GM	05/12/23	0.20	1	(ANTHONY VALADEZ) COMMUNICATION WITH A. BROWN RE: JURY INSTRUCTIONS.
WYATT GM	05/12/23	2.00	1	(ANTHONY VALADEZ) REVISE OBJECTIONS TO DEPOSITION DESIGNATIONS FOR EXPERT.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	05/12/23	1.10	1	(ANTHONY VALADEZ) REVISE SUPPLEMENTAL BRIEF IN SUPPORT OF MIL.
BALZANO AJ	05/13/23	1.10	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS EXAMINATION OUTLINE.
COGSWELL S	05/13/23	0.60	1	(ANTHONY VALADEZ) REVIEW MEDICAL RECORDS (0.2); REVIEW FACTUAL BACKGROUND RESEARCH FOR OUTLINES (0.4).
EINSTEIN J *	05/13/23	6.40	1	(ANTHONY VALADEZ) REVIEW EXPERT TRANSCRIPTS IN SUPPORT OF CROSS OUTLINE.
LEIBOVITZ A	05/13/23	14.20	1	(ANTHONY VALADEZ) REVISE TRIAL EXHIBIT LIST (8.2); COMPILE TRIAL EXHIBITS FOR EXCHANGE (3.6); PREPARE EXPERT MATERIALS FOR ATTORNEY REVIEW IN CONNECTION WITH DRAFTING CROSS OUTLINES (2.4).
MARTIN SE	05/13/23	5.10	1	(ANTHONY VALADEZ) REVIEW CURRENT DRAFT OF EXHIBIT LIST (4.0); CONFER WITH A. KARP AND K MULLALEY RE: SAME (1.1).
MULLALEY CI	05/13/23	6.20	1	(ANTHONY VALADEZ) PREPARE FOR DRAFTING EXPERT CROSS EXAMINATION OUTLINE.
WUAMETT ND	05/13/23	0.80	1	(ANTHONY VALADEZ) REVISE SUPPLEMENTAL TRIAL BRIEF.
BALZANO AJ	05/14/23	7.20	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS EXAMINATION OUTLINE.
COGSWELL S	05/14/23	4.00	1	(ANTHONY VALADEZ) REVIEW BACKGROUND MATERIAL IN SUPPORT OF EXPERT CROSS OUTLINE.
EINSTEIN J *	05/14/23	5.30	1	(ANTHONY VALADEZ) REVIEW EXPERT TRANSCRIPTS IN SUPPORT OF CROSS OUTLINE.
LEIBOVITZ A	05/14/23	14.70	1	(ANTHONY VALADEZ) REVISE TRIAL EXHIBIT LIST (6.0); PREPARE EXHIBITS FOR EXHIBIT EXCHANGE (8.7).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN SE	05/14/23	3.60	1	(ANTHONY VALADEZ) REVISE TRIAL EXHIBIT LIST (1.2); CONFER WITH A. LEIBOVITZ RE: SAME (0.3); COORDINATE TRIAL SITE LOGISTICS (1.1); ASSIST WITH PREPARATION OF EXPERT OUTLINE (1.0).
MULLALEY CI	05/14/23	1.30	1	(ANTHONY VALADEZ) RESEARCH IN SUPPORT OF EXPERT CROSS OUTLINE (0.8); EMAIL COMMUNICATIONS WITH S. MARTIN AND A. LEIBOVITZ RE: EXHIBIT LIST (0.5).
SILVERSTEIN RA	05/14/23	5.50	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS OUTLINE.
BALZANO AJ	05/15/23	0.70	1	(ANTHONY VALADEZ) DRAFT TALKING POINTS RE: MOTION TO COMPEL.
BALZANO AJ	05/15/23	12.10	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BENARDOS E	05/15/23	5.20	1	(ANTHONY VALADEZ) ANALYZE MEDICAL RECORDS.
BROWN AM	05/15/23	11.00	1	(ANTHONY VALADEZ) PARTICIPATE IN JURY SELECTION (4.5) AND PREPARE FOR OPENING (3.7) AND EXPERT CROSS EXAMINATIONS (2.8).
COGSWELL S	05/15/23	8.20	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS EXAMINATION OUTLINE (3.8); DRAFT EXPERT DEPOSITION DESIGNATIONS (4.6).
DAVIDSON J	05/15/23	0.30	1	(ANTHONY VALADEZ) CONFER WITH A. BROWN, G. WYATT, Z. MARTIN, C. MULLALEY RE: TRIAL STRATEGY AND EXPERT ISSUES.
EINSTEIN J *	05/15/23	8.50	1	(ANTHONY VALADEZ) RESEARCH FOR EXPERT CROSS OUTLINE (0.7); REVIEW EXPERT TRANSCRIPTS IN SUPPORT OF CROSS OUTLINE. (3.2); DRAFT COUNTERS AND OBJECTIONS TO PLAINTIFF'S DEPOSITION DESIGNATIONS FOR COMPANY WITNESS ( 4.6).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

GALLAGHER P	05/15/23	3.10	1	(ANTHONY VALADEZ) DRAFT TALKING POINTS FOR SUPPLEMENTAL BRIEFING.
GALLAGHER P	05/15/23	0.60	1	(ANTHONY VALADEZ) CORRESPONDENCE TO G. WYATT SUMMARIZING PLAINTIFF'S OPPOSITION TO SUPPLEMENTAL BRIEFING.
GALLAGHER P	05/15/23	0.30	1	(ANTHONY VALADEZ) REVIEW PLAINTIFF'S OPPOSITION TO SUPPLEMENTAL BRIEFING TO DEFENDANTS' MOTION IN LIMINE.
LEIBOVITZ A	05/15/23	19.00	1	(ANTHONY VALADEZ) REVISE TRIAL EXHIBIT LIST (6.6); PREPARE EXHIBITS FOR EXCHANGE WITH PLAINTIFF'S COUNSEL (8.7); REVIEW KEY PLEADINGS (1.3); ASSIST WITH PREPARATION OF DEPOSITION DESIGNATIONS FOR COMPANY WITNESS (2.4).
LOFFELMAN KL	05/15/23	1.20	1	(ANTHONY VALADEZ) EDIT SUPPLEMENTAL BRIEF FOR MOTION IN LIMINE.
LOFFELMAN KL	05/15/23	0.20	1	(ANTHONY VALADEZ) REVIEW BANKRUPTCY MATERIALS.
MAHADEVAN V	05/15/23	5.40	1	(ANTHONY VALADEZ) COMPILE EXPERT MATERIAL FOR ATTORNEY REVIEW FOR CROSS OUTLINE (3.5); ASSIST WITH DRAFTING TRIAL EXHIBIT LIST (1.9).
MARTIN SE	05/15/23	9.50	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF AFFIRMATIVE DEPOSITION DESIGNATIONS (5.4); CORRESPONDENCE WITH K. MULLALEY AND J. MORALES (CORE LEGAL) RE: SAME (0.6); ASSIST WITH FINALIZATION OF TRIAL EXHIBIT LIST (2.0); COMPILE HARDSHIP FORMS AND JURY QUESTIONNAIRES (0.8); FINALIZE SUPPLEMENTAL BRIEFS FOR MILS FOR FILING (0.7).
MARTIN ZW	05/15/23	3.50	1	(ANTHONY VALADEZ) DRAFT TRIAL BRIEF.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN ZW	05/15/23	4.00	1	(ANTHONY VALADEZ) LEGAL RESEARCH RE: TRIAL BRIEF.
MULLALEY CI	05/15/23	13.10	1	(ANTHONY VALADEZ) DRAFT OPENING SLIDES (5.6); REVIEW MATERIALS TO PREPARE RE: EXPERT CROSS EXAMINATION OUTLINE (2.2); COMMUNICATE WITH S. MARTIN RE: EXHIBIT LIST (0.5); REVISE EXPERT DESIGNATIONS (4.2); CONFER WITH R. BERNARDO AND A. BROWN RE: PMQ NOD (0.6).
ROSE NR	05/15/23	0.50	1	(ANTHONY VALADEZ) CALL WITH R. BERNARDO RE: STRATEGY FOR RESPONDING TO PLAINTIFF'S MOTION.
SILVERSTEIN RA	05/15/23	7.50	1	(ANTHONY VALADEZ) REVISE EXPERT CROSS OUTLINE.
SILVERSTEIN RA	05/15/23	0.10	1	(ANTHONY VALADEZ) REVIEW CORRESPONDENCE FROM Z. MARTIN REGARDING RESEARCH FOR TRIAL MOTION.
TRANGLE AS	05/15/23	1.70	1	(ANTHONY VALADEZ) REVIEW EXPERT TRANSCRIPTS IN SUPPORT OF CROSS OUTLINE.
WUAMETT ND	05/15/23	2.50	1	(ANTHONY VALADEZ) REVISE SUPPLEMENTAL BRIEF RE: MILS.
WYATT GM	05/15/23	1.00	1	(ANTHONY VALADEZ) REVISE SUPPLEMENTAL MOTION IN LIMINE.
WYATT GM	05/15/23	0.30	1	(ANTHONY VALADEZ) PREPARE FOR HEARING ON PRETRIAL MOTIONS.
WYATT GM	05/15/23	5.30	1	(ANTHONY VALADEZ) DRAFT PROPOSED JURY INSTRUCTIONS.
WYATT GM	05/15/23	0.50	1	(ANTHONY VALADEZ) COMMUNICATION WITH R. BERNARDO RE: DISCOVERY ISSUE.
WYATT GM	05/15/23	1.10	1	(ANTHONY VALADEZ) ATTEND COURT HEARING.
BALZANO AJ	05/16/23	6.50	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS EXAMINATION OUTLINE.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BALZANO AJ	05/16/23	1.30	1	(ANTHONY VALADEZ) CONDUCT RESEARCH IN SUPPORT OF MILS.
BALZANO AJ	05/16/23	1.10	1	(ANTHONY VALADEZ) REVIEW FACTUAL RESEARCH TO DRAFT OPENING.
BALZANO AJ	05/16/23	0.60	1	(ANTHONY VALADEZ) REVIEW FACTUAL RESEARCH TO DRAFT OPENING.
BENARDOS E	05/16/23	8.60	1	(ANTHONY VALADEZ) ANALYZE MEDICAL RECORDS FOR TRIAL.
BROWN AM	05/16/23	10.00	1	(ANTHONY VALADEZ) PARTICIPATE IN JURY SELECTION (4.0) AND PREPARE FOR OPENING (3.7) AND EXPERT CROSS EXAMINATIONS (2.3).
COGSWELL S	05/16/23	6.50	1	(ANTHONY VALADEZ) REVIEW MEDICAL RECORDS FOR TRIAL (2.3); COMMUNICATE WITH TRIAL TEAM RE: SAME (1.1); DRAFT TREATER CROSS EXAMINATION OUTLINE (3.1).
DAVIDSON J	05/16/23	1.00	1	(ANTHONY VALADEZ) CONFER WITH G. WYATT, Z. MARTIN, A. LIEBOVITZ AND A. BROWN RE: MOTIONS AND TRIAL STRATEGY.
EINSTEIN J *	05/16/23	9.80	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS AND COUNTERS TO COMPANY WITNESS DEPOSITION DESIGNATIONS (7.5). CORRESPOND WITH A. BALZANO RE: EXPERT CROSS OUTLINE (0.2); ASSIST WITH FACTUAL RESEARCH FOR OUTLINES (2.1).
KARP AM	05/16/23	1.90	1	(ANTHONY VALADEZ) REVIEW FACTUAL BACKGROUND DOCUMENTS FOR TRIAL.
LEIBOVITZ A	05/16/23	10.40	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF TRIAL EXHIBIT LIST (5.4); PREPARE EXHIBITS FOR TRIAL (2.1); PREPARE EXPERT MATERIALS FOR ATTORNEY REVIEW IN CONNECTION WITH CROSS PREPARATION (2.6); REVIEW KEY PLEADINGS (0.3).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

LOFFELMAN KL	05/16/23	0.30	1	(ANTHONY VALADEZ) REVISE MOTION TO ADMIT EVIDENCE (0.1); REVISE DECLARATION RE: SAME (0.1).
MAHADEVAN V	05/16/23	6.20	1	(ANTHONY VALADEZ) REVIEW DOCUMENTS FOR TRIAL EXHIBIT LIST.
MARTIN SE	05/16/23	11.90	1	(ANTHONY VALADEZ) ASSIST WITH REVISING COUNTERS AND OBJECTIONS TO COMPANY WITNESS DEPOSITION DESIGNATIONS (2.8); COORDINATE WITH A. LEIBOVITZ RE: TRIAL LOGISTICS (1.6); ASSIST WITH JURY SELECTION (2.2); REVIEW FINAL EXHIBITS TO BE EXCHANGED (1.9); COMPILE KEY BRIEFING FOR FURTHER ATTORNEY REVIEW (2.1); COMPILE KEY EXPERT TESTIMONY FOR CROSS OUTLINES (1.3).
MARTIN ZW	05/16/23	2.30	1	(ANTHONY VALADEZ) DRAFT TRIAL BRIEF.
MARTIN ZW	05/16/23	1.20	1	(ANTHONY VALADEZ) LEGAL RESEARCH FOR MOTION TO QUASH.
MARTIN ZW	05/16/23	2.60	1	(ANTHONY VALADEZ) RESEARCH RE: POTENTIAL MOTION.
MARTIN ZW	05/16/23	0.20	1	(ANTHONY VALADEZ) DRAFT MOTION TO QUASH DEPOSITION NOTICE.
MARTIN ZW	05/16/23	0.70	1	(ANTHONY VALADEZ) REVIEW PLAINTIFF'S MIL.
MCNULTY PA	05/16/23	0.20	1	(ANTHONY VALADEZ) TEL. CONF. WITH JONES DAY AND A. ST. AMAND RE: PRODUCTION.
MULLALEY CI	05/16/23	14.70	1	(ANTHONY VALADEZ) DRAFT OPENING SLIDES (12.1); REVIEW EXPERT CROSS EXAMINATION OUTLINE (2.3); CONFER WITH G. WYATT RE: POTENTIAL TRIAL BRIEF (0.3).
SILVERSTEIN RA	05/16/23	3.40	1	(ANTHONY VALADEZ) RESEARCH CA LAW FOR POTENTIAL MOTION (2.7) AND DRAFT MEMORANDUM RE: SAME (0.7).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

SILVERSTEIN RA	05/16/23	0.10	1	(ANTHONY VALADEZ) CIRCULATE EXPERT CROSS OUTLINE.
SILVERSTEIN RA	05/16/23	3.70	1	(ANTHONY VALADEZ) RESEARCH FOR POTENTIAL MOTION.
TRANGLE AS	05/16/23	3.20	1	(ANTHONY VALADEZ) REVIEW DOCUMENTS FOR EXPERT CROSS OUTLINE.
WYATT GM	05/16/23	0.10	1	(ANTHONY VALADEZ) CONFER WITH R. BERNARDO RE: STRATEGIC CONSIDERATIONS.
WYATT GM	05/16/23	1.10	1	(ANTHONY VALADEZ) ATTEND HEARING ON MOTIONS.
WYATT GM	05/16/23	1.20	1	(ANTHONY VALADEZ) PREPARE FOR ARGUMENT RE: NOTICE OF DEPOSITION.
WYATT GM	05/16/23	0.30	1	(ANTHONY VALADEZ) CONFER WITH A. BROWN, Z. MARTIN AND A. BOLZANO RE: PLAINTIFF'S PROPOSED DISCOVERY.
WYATT GM	05/16/23	0.90	1	(ANTHONY VALADEZ) PREPARE FOR HEARING RE: PLAINTIFF'S TRIAL BRIEF.
WYATT GM	05/16/23	0.30	1	(ANTHONY VALADEZ) CONFER WITH B. KING (K&S) RE: MOTION TO ADMIT TESTIMONY.
WYATT GM	05/16/23	3.50	1	(ANTHONY VALADEZ) DRAFT VERDICT FORM.
WYATT GM	05/16/23	0.20	1	(ANTHONY VALADEZ) COMMUNICATE INTERNALLY RE: DEPOSITION DESIGNATIONS.
WYATT GM	05/16/23	0.10	1	(ANTHONY VALADEZ) CONFER WITH A. KASPARIE RE: EVIDENCE MATTERS.
BALZANO AJ	05/17/23	5.90	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BALZANO AJ	05/17/23	1.60	1	(ANTHONY VALADEZ) CONDUCT RESEARCH TO ASSIST WITH PREPARATION OF OPENING SLIDES.
BALZANO AJ	05/17/23	0.60	1	(ANTHONY VALADEZ) CALL WITH A. KARP RE: TRIAL ISSUES.



**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BALZANO AJ	05/17/23	3.80	1	(ANTHONY VALADEZ) CONDUCT LEGAL RESEARCH FOR POTENTIAL MOTION.
BALZANO AJ	05/17/23	2.60	1	(ANTHONY VALADEZ) CONDUCT FACTUAL RESEARCH FOR OPENING.
BENARDOS E	05/17/23	4.00	1	(ANTHONY VALADEZ) ANALYZE MEDICAL RECORDS FOR TRIAL.
BERNARDO RT	05/17/23	0.20	1	(ANTHONY VALADEZ) CONSULT WITH G. WYATT RE: STRATEGIC CONSIDERATIONS.
BROWN AM	05/17/23	8.00	1	(ANTHONY VALADEZ) PARTICIPATE IN JURY SELECTION (4.0) AND PREPARE FOR OPENING (4.0).
COGSWELL S	05/17/23	10.20	1	(ANTHONY VALADEZ) ANALYZE PRIOR EXPERT TESTIMONY IN SUPPORT OF CROSS OUTLINES (3.7); REVIEW MEDICAL RECORDS FOR TRIAL (0.9); COMMUNICATE WITH TRIAL TEAM RE: SAME (0.2); REVIEW EXPERT REPORT (1.6); REVISE TREATER OUTLINES (3.8).
DAVIDSON J	05/17/23	1.40	1	(ANTHONY VALADEZ) CONFER WITH L. WILSON AND B. BISHOP (WILCOX SAVAGE) RE: EXPERT ISSUES FOR TRIAL.
EINSTEIN J *	05/17/23	9.60	1	(ANTHONY VALADEZ) RESEARCH EXPERT BACKGROUND (3.5); REVISE FACTUAL RESEARCH SUMMARY (1.7). REVIEW EXPERT TESTIMONY IN PREPARATION FOR OUTLINE (0.2); REVISE COMPANY WITNESS DEPOSITION DESIGNATIONS (4.2).
KARP AM	05/17/23	0.10	1	(ANTHONY VALADEZ) REVIEW COMPANY DOCUMENTS, IN CONNECTION WITH RESPONDING TO PLAINTIFF'S FACTUAL ALLEGATIONS.
KARP AM	05/17/23	0.30	1	(ANTHONY VALADEZ) CONFER WITH A. BROWN, C. MULLALEY AND A. KASPARIE REGARDING TRIAL STRATEGY.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

KARP AM	05/17/23	1.30	1	(ANTHONY VALADEZ) CONFER WITH A. BALZANO, M. VIVES (K&S) AND K. HYNES (K&S) REGARDING TRIAL ISSUES.
KASPARIE AJ	05/17/23	1.60	1	(ANTHONY VALADEZ) DRAFT SUMMARY OF RESEARCH RE: EVIDENCE MATTERS.
LEIBOVITZ A	05/17/23	9.90	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF DEFENDANTS' EXHIBITS (4.6); PREPARE EXPERT MATERIALS FOR ATTORNEY REVIEW (3.2); REVIEW MEDICAL RECORDS (1.3); REVIEW KEY PLEADINGS (0.8).
MAHADEVAN V	05/17/23	5.30	1	(ANTHONY VALADEZ) PREPARE TRIAL EXHIBITS.
MARTIN SE	05/17/23	10.00	1	(ANTHONY VALADEZ) COMPILE JUROR HARDSHIP FORMS AND QUESTIONNAIRES IN CONNECTION WITH JURY SELECTION (3.9); COMPILE COMPANY DOCUMENTS FOR REFERENCE AT TRIAL (4.7); COORDINATE WITH T. KOESTER (NELSON MULLINS) RE: TRIAL LOGISTICS (0.8); CONFER WITH G. WYATT RE: BRIEFING SCHEDULE (0.6).
MARTIN ZW	05/17/23	8.90	1	(ANTHONY VALADEZ) DRAFT OPPOSITION TO PLAINTIFF'S MIL.
MARTIN ZW	05/17/23	1.10	1	(ANTHONY VALADEZ) RESEARCH RE: POTENTIAL MOTION.
MULLALEY CI	05/17/23	15.20	1	(ANTHONY VALADEZ) REVISE OPENING SLIDES (9.1); CALL WITH A. BROWN RE: OPENING (2.6); CONFER WITH A. BROWN, G. WYATT, A. KASPARIE AND A. KARP RE: TRIAL STRATEGY (0.8); CALL WITH C. TEBEAU RE: OPENING (1.4); COMMUNICATE WITH A. BROWN, S. KO AND J. EINSTEIN RE: FACTUAL RESEARCH (1.3).
SILVERSTEIN RA	05/17/23	0.10	1	(ANTHONY VALADEZ) EMAIL A. BROWN CONCERNING EXPERT CROSS OUTLINE.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

SILVERSTEIN RA	05/17/23	0.80	1	(ANTHONY VALADEZ) CONDUCT RESEARCH FOR BRIEF.
SILVERSTEIN RA	05/17/23	3.80	1	(ANTHONY VALADEZ) CONDUCT RESEARCH FOR POTENTIAL MOTION (2.9) AND WRITE MEMO WITH IMPRESSIONS FOR CO-COUNSEL (0.9).
SILVERSTEIN RA	05/17/23	1.60	1	(ANTHONY VALADEZ) REVISE EXPERT CROSS OUTLINE.
TRANGLE AS	05/17/23	1.80	1	(ANTHONY VALADEZ) REVIEW KEY DOCUMENTS FOR OPENING SLIDES.
TRANGLE AS	05/17/23	3.10	1	(ANTHONY VALADEZ) REVIEW KEY DOCUMENTS FOR OPENING SLIDES.
TRANGLE AS	05/17/23	2.30	1	(ANTHONY VALADEZ) REVIEW FACTUAL RESEARCH FOR OPENING SLIDES.
TRANGLE AS	05/17/23	2.80	1	(ANTHONY VALADEZ) CONDUCT LEGAL RESEARCH FOR MOTION IN LIMINE.
WYATT GM	05/17/23	3.20	1	(ANTHONY VALADEZ) PREPARE FOR MOTIONS HEARING.
WYATT GM	05/17/23	0.80	1	(ANTHONY VALADEZ) CONFER WITH A. BROWN, CO-COUNSEL AND CO-DEFENDANTS' COUNSEL RE: JURY INSTRUCTIONS (0.6) AND REVISE SAME (0.2).
WYATT GM	05/17/23	1.80	1	(ANTHONY VALADEZ) REVISE DEPOSITION DESIGNATIONS AND OBJECTIONS RE: COMPANY WITNESS.
BALZANO AJ	05/18/23	4.00	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BALZANO AJ	05/18/23	7.00	1	(ANTHONY VALADEZ) REVIEW COMPANY DOCUMENTS FOR OPENING SLIDES.
BALZANO AJ	05/18/23	1.30	1	(ANTHONY VALADEZ) CONDUCT LEGAL RESEARCH FOR POTENTIAL MOTION.
BENARDOS E	05/18/23	6.50	1	(ANTHONY VALADEZ) REVIEW MEDICAL RECORDS FOR TRIAL.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BROWN AM	05/18/23	11.00	1	(ANTHONY VALADEZ) PARTICIPATE IN JURY SELECTION (4.0) AND PREPARE FOR OPENING (3.7) AND EXPERT CROSS EXAMINATIONS (3.3).
COGSWELL S	05/18/23	5.20	1	(ANTHONY VALADEZ) REVIEW MEDICAL RECORDS (2.1); REVIEW TRIAL TRANSCRIPT (1.2); REVISE EXPERT OUTLINE (1.9)
				.
DAVIDSON J	05/18/23	1.50	1	(ANTHONY VALADEZ) REVISE MOTIONS IN LIMINE (0.8); REVISE BRIEF (0.7).
EINSTEIN J *	05/18/23	12.40	1	(ANTHONY VALADEZ) REVIEW PRIOR EXPERT TESTIMONY (7.4); REVISE COMPANY WITNESS COUNTERS AND OBJECTIONS (3.2) AND DRAFT GENERAL OBJECTIONS (1.8).
KARP AM	05/18/23	3.60	1	(ANTHONY VALADEZ) CONFER WITH A. BROWN, A. BALZANO AND C. MULLALEY REGARDING STRATEGY CONSIDERATIONS (3.2) AND REVIEW DOCUMENTS RE: SAME (0.4).
LEIBOVITZ A	05/18/23	9.40	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF EXHIBITS (3.2); REVISE EXHIBIT LIST (1.9); PREPARE EXPERT MATERIALS FOR ATTORNEY REVIEW FOR CROSS OUTLINES (2.3); REVIEW MEDICAL RECORDS (1.2); REVIEW KEY PLEADINGS (0.8).
LOFFELMAN KL	05/18/23	1.90	1	(ANTHONY VALADEZ) REVISE MOTION TO EXCLUDE (1.4); DRAFT EXHIBITS TO SAME (0.5).
LOFFELMAN KL	05/18/23	0.30	1	(ANTHONY VALADEZ) REVISE OPPOSITION TO PLAINTIFF'S MOTION IN LIMINE.
LOFFELMAN KL	05/18/23	1.60	1	(ANTHONY VALADEZ) REVISE MOTION TO EXCLUDE.
MAHADEVAN V	05/18/23	3.80	1	(ANTHONY VALADEZ) PREPARE TRIAL EXHIBITS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN SE	05/18/23	9.80	1	(ANTHONY VALADEZ) FINALIZE OBJECTIONS AND COUNTER-DESIGNATIONS TO PLAINTIFF'S COMPANY WITNESS DESIGNATIONS (2.3); COORDINATE WITH A. LEIBOVITZ RE: REVISIONS TO TRIAL EXHIBIT LIST (0.9); COMPILE KEY DOCUMENTS FOR FURTHER ATTORNEY REVIEW (1.6); SERVE FILINGS AND DISTRIBUTE TO TEAM (0.6); CONFER WITH K. MULLALEY RE: PREPARATION FOR EXPERT DEPOSITION (0.4); ANALYZE TESTIMONY OF COMPANY WITNESSES IN PREPARATION FOR DEPOSITION (3.7); CORRESPONDENCE WITH A. COX RE: SAME (0.3).
MARTIN ZW	05/18/23	1.40	1	(ANTHONY VALADEZ) CONFER WITH G. WYATT, A. TRANGLE, A. BALZANO, AND JONES DAY RE: POTENTIAL MOTION.
MARTIN ZW	05/18/23	0.50	1	(ANTHONY VALADEZ) REVISE MOTION.
MARTIN ZW	05/18/23	0.10	1	(ANTHONY VALADEZ) REVIEW PLAINTIFFS MILS TO PREPARE TO DRAFT OPPOSITION.
MARTIN ZW	05/18/23	3.90	1	(ANTHONY VALADEZ) DRAFT OPP'N TO MIL.
MARTIN ZW	05/18/23	1.70	1	(ANTHONY VALADEZ) LEGAL RESEARCH FOR POTENTIAL MOTION.
MOORE RE	05/18/23	0.20	1	(ANTHONY VALADEZ) DISCUSS WITH N. ROSE REGARDING CA LAW RESEARCH FOR MOTIONS PREPARATION.
MULLALEY CI	05/18/23	11.40	1	(ANTHONY VALADEZ) CALL WITH A. BROWN RE: OPENING (1.4), REVISE OPENING SLIDES (3.2), DRAFT EXPERT OUTLINE (4.7), EMAIL L. WILLSON RE: EXPERT ISSUES (0.4), REVIEW KEY COMPANY DOCUMENTS FOR TRIAL (1.7).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

ROSE NR	05/18/23	3.50	1	(ANTHONY VALADEZ) DRAFT STRATEGY MEMO RE: DISCOVERY ISSUES.
SILVERSTEIN RA	05/18/23	7.90	1	(ANTHONY VALADEZ) REVIEW TRIAL TESTIMONY (3.2) AND REVISE CROSS OUTLINE ACCORDINGLY (4.7).
TRANGLE AS	05/18/23	1.90	1	(ANTHONY VALADEZ) CONDUCT LEGAL RESEARCH FOR POTENTIAL MOTION.
TRANGLE AS	05/18/23	3.90	1	(ANTHONY VALADEZ) CONDUCT LEGAL RESEARCH FOR POTENTIAL MOTION.
WYATT GM	05/18/23	1.00	1	(ANTHONY VALADEZ) ATTEND COURT HEARING.
WYATT GM	05/18/23	1.50	1	(ANTHONY VALADEZ) REVISE DEPOSITION DESIGNATIONS AND OBJECTIONS RE: COMPANY WITNESS.
WYATT GM	05/18/23	0.50	1	(ANTHONY VALADEZ) ANALYZE RESEARCH RE: POTENTIAL MOTION.
WYATT GM	05/18/23	1.30	1	(ANTHONY VALADEZ) REVISE DEPOSITION DESIGNATIONS AND OBJECTIONS RE: COMPANY WITNESS.
WYATT GM	05/18/23	4.30	1	(ANTHONY VALADEZ) PREPARE FOR MOTIONS HEARING.
WYATT GM	05/18/23	0.20	1	(ANTHONY VALADEZ) COMMUNICATION WITH CO-DEFENDANTS' COUNSEL RE: JURY INSTRUCTIONS.
BAGGETTA B	05/19/23	1.20	1	(ANTHONY VALADEZ) CONDUCT LEGAL RESEARCH ON DISCOVERY ISSUES (1.2).
BAGGETTA B	05/19/23	1.30	1	(ANTHONY VALADEZ) FINALIZE SARGON BRIEF AND SUPPORTING PAPERS (1.3).
BAGGETTA B	05/19/23	1.20	1	(ANTHONY VALADEZ) REVISE BRIEF AND SUPPORTING MATERIALS (1.2).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BAGGETTA B	05/19/23	1.10	1	(ANTHONY VALADEZ) FINALIZE BRIEF AND SUPPORTING PAPERS (1.1) .
BALZANO AJ	05/19/23	6.80	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BALZANO AJ	05/19/23	3.20	1	(ANTHONY VALADEZ) DRAFT REPLY IN SUPPORT OF MOTION TO COMPEL.
BALZANO AJ	05/19/23	1.80	1	(ANTHONY VALADEZ) REVIEW KEY DOCUMENTS FOR TRIAL PREPARATION.
BRIER A	05/19/23	0.80	1	(ANTHONY VALADEZ) PREPARE EXHIBITS TO MEMO IN SUPPORT OF MOTION TO EXCLUDE.
BROWN AM	05/19/23	2.00	1	(ANTHONY VALADEZ) WORK ON OPENING (1.1) AND CONFERENCE CALL WITH K.MULLALEY REGARDING THE SAME (0.9) .
COGSWELL S	05/19/23	2.80	1	(ANTHONY VALADEZ) REVIEW NEW MEDICAL RECORDS.
DAVIDSON J	05/19/23	0.50	1	(ANTHONY VALADEZ) REVISE BRIEFS.
DAVIDSON J	05/19/23	2.30	1	(ANTHONY VALADEZ) REVISE MOTIONS IN LIMINE (1.4) ; CALLS WITH TRIAL TEAM RE: STRATEGIC ISSUES (.9) .
EINSTEIN J *	05/19/23	8.10	1	(ANTHONY VALADEZ) REVIEW PRIOR EXPERT TESTIMONY (6.4) ; RESEARCH CASE LAW RE: ADMISSIBILITY OF DOCUMENTS (1.7) .
KARP AM	05/19/23	1.30	1	(ANTHONY VALADEZ) CONFER WITH A. BROWN AND A. BALZANO IN CONNECTION WITH DEVELOPING FACTS FOR TRIAL.
KARP AM	05/19/23	0.30	1	(ANTHONY VALADEZ) CONFER WITH G. WYATT, C. COX AND C. SANTOLI REGARDING POTENTIAL MOTION.
KARP AM	05/19/23	0.30	1	(ANTHONY VALADEZ) CONFER WITH J. SCHWARTZ AND A. BALZANO REGARDING MIL.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

LEIBOVITZ A	05/19/23	11.30	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF EXHIBITS (3.2); REVISE EXHIBIT LIST (1.9); PREPARE EXPERT MATERIALS FOR ATTORNEY REVIEW FOR CROSS OUTLINES (2.3); REVIEW MEDICAL RECORDS (1.2); REVIEW KEY PLEADINGS (0.8).
LOFFELMAN KL	05/19/23	0.90	1	(ANTHONY VALADEZ) RESEARCH DISCOVERY ISSUES FOR BRIEFING.
LOFFELMAN KL	05/19/23	0.30	1	(ANTHONY VALADEZ) REVISE REPLY IN SUPPORT OF MOTION TO COMPEL PRODUCTION.
LOFFELMAN KL	05/19/23	0.60	1	(ANTHONY VALADEZ) ASSIST WITH DRAFTING OF OPPOSITION TO PLAINTIFF'S MIL.
LOFFELMAN KL	05/19/23	0.60	1	(ANTHONY VALADEZ) REVISE MOTION TO EXCLUDE (0.4); FINALIZE EXHIBITS TO SAME (0.2).
LOFFELMAN KL	05/19/23	4.40	1	(ANTHONY VALADEZ) REVISE OPPOSITION TO PLAINTIFF'S MOTION IN LIMINE (1.9); DRAFT EXHIBITS TO SAME (1.6); ASSIST WITH FINALIZING SAME FOR SUBMISSION TO COURT (0.9).
LOFFELMAN KL	05/19/23	0.50	1	(ANTHONY VALADEZ) EDIT MOTION TO EXCLUDE (0.3); ASSIST WITH FINALIZING SAME FOR SUBMISSION TO COURT (0.2).
MAHADEVAN V	05/19/23	3.70	1	(ANTHONY VALADEZ) PREPARE TRIAL EXHIBITS (3.0); CONFER WITH A. LEIBOVITZ RE: SAME (0.7).



**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN SE	05/19/23	6.30	1	(ANTHONY VALADEZ) ASSIST WITH REVISIONS TO TRIAL EXHIBIT LIST (1.1); COORDINATE ORGANIZATION OF COMPLETED DEPOSITIONS AND EXPERT REPORTS IN PREPARATION FOR TRIAL (1.4); REVIEW MOTION TO COMPEL IN CONNECTION WITH ORAL ARGUMENTS ON MOTION (1.1); REVISE VOLUMINOUS COMPANY DOCUMENTS ANALYSIS IN PREPARATION FOR TRIAL (2.7).
MARTIN ZW	05/19/23	0.50	1	(ANTHONY VALADEZ) REVISE OPPOSITION TO MIL.
MARTIN ZW	05/19/23	4.00	1	(ANTHONY VALADEZ) LEGAL RESEARCH RE: OPPOSITION TO MIL.
MARTIN ZW	05/19/23	0.50	1	(ANTHONY VALADEZ) LEGAL RESEARCH RE: POTENTIAL MOTION.
MARTIN ZW	05/19/23	2.70	1	(ANTHONY VALADEZ) DRAFTING OPPOSITION TO MIL.
MOORE RE	05/19/23	2.00	1	(ANTHONY VALADEZ) RESEARCH CASE LAW ON DISCOVERY ISSUES.
MOORE RE	05/19/23	2.30	1	(ANTHONY VALADEZ) RESEARCH CASE LAW ON DISCOVERY ISSUES.
MOORE RE	05/19/23	3.10	1	(ANTHONY VALADEZ) RESEARCH CA LAW RELATED TO DISCOVERY ISSUES.
MULLALEY CI	05/19/23	14.30	1	(ANTHONY VALADEZ) REVISE OPENING SLIDES (4.1), COMMUNICATE WITH J. EINSTEIN RE: EXPERT CROSS EXAMINATION OUTLINE (0.3), COMMUNICATE WITH J. SCHWARTZ RE: MIL (1.2), COMMUNICATE WITH Z. MARTIN RE: MOTION TO QUASH (0.4), COMMUNICATE WITH A. LEIBOVITZ RE: EXHIBIT LIST (2.1), COMMUNICATE WITH A. LEIBOVITZ RE: OPENING SLIDES (0.6), CALL WITH A. BROWN RE: OPENING (0.9), REVISE EXPERT CROSS EXAMINATION OUTLINE (4.7).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

ROSE NR	05/19/23	2.20	1	(ANTHONY VALADEZ) EDIT STRATEGY MEMO RE: DISCOVERY ISSUES.
SCHWARTZ JM	05/19/23	7.60	1	(ANTHONY VALADEZ) DRAFT OPPOSITION TO PLAINTIFF'S MOTION IN LIMINE (6.40); CONFER WITH C. MULLALEY RE: SAME.
SCHWARTZ JM	05/19/23	2.70	1	(ANTHONY VALADEZ) REVISE OPPOSITION TO PLAINTIFF'S MOTION IN LIMINE.
SCHWARTZ JM	05/19/23	0.20	1	(ANTHONY VALADEZ) PARTICIPATE ON CALL WITH J. DAVIDSON RE: PLAINTIFF'S MOTION TO PRECLUDE EVIDENCE.
SILVERSTEIN RA	05/19/23	0.10	1	(ANTHONY VALADEZ) REVIEW MEDICAL RECORDS.
SILVERSTEIN RA	05/19/23	0.30	1	(ANTHONY VALADEZ) REVIEW EXPERT DEPOSITION.
TRANGLE AS	05/19/23	3.30	1	(ANTHONY VALADEZ) RESEARCH CASE LAW FOR MOTION TO COMPEL.
TRANGLE AS	05/19/23	2.00	1	(ANTHONY VALADEZ) RESEARCH CASE LAW ON MOTIONS TO COMPEL.
TRANGLE AS	05/19/23	3.80	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS EXAMINATION.
TRANGLE AS	05/19/23	1.10	1	(ANTHONY VALADEZ) RESEARCH CASE LAW FOR TRIAL BRIEF.
WYATT GM	05/19/23	1.20	1	(ANTHONY VALADEZ) REVISE PROPOSED JURY INSTRUCTIONS.
WYATT GM	05/19/23	1.40	1	(ANTHONY VALADEZ) REVISE REPLY BRIEF.
WYATT GM	05/19/23	0.30	1	(ANTHONY VALADEZ) COMMUNICATION WITH A. BALZANO RE: OUTLINE OF REPLY BRIEF.
WYATT GM	05/19/23	0.50	1	(ANTHONY VALADEZ) ANALYZE PLAINTIFF'S OPPOSITION TO MOTION TO COMPEL MENTAL HEALTH RECORDS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	05/19/23	0.20	1	(ANTHONY VALADEZ) COMMUNICATION WITH N. ROSE RE: DISCOVERY ISSUES.
WYATT GM	05/19/23	0.60	1	(ANTHONY VALADEZ) REVISE OBJECTIONS AND COUNTERS TO COMPANY WITNESS DESIGNATIONS.
WYATT GM	05/19/23	0.20	1	(ANTHONY VALADEZ) ANALYZE PLAINTIFF'S MOTION TO EXCLUDE.
WYATT GM	05/19/23	0.70	1	(ANTHONY VALADEZ) COMMUNICATION WITH Z. MARTIN RE: OUTLINE OF POTENTIAL MOTION.
WYATT GM	05/19/23	0.60	1	(ANTHONY VALADEZ) PREPARE FOR ARGUMENT RE: JURY INSTRUCTIONS.
BROWN AM	05/20/23	4.00	1	(ANTHONY VALADEZ) PREPARE OPENING.
COGSWELL S	05/20/23	6.00	1	(ANTHONY VALADEZ) DRAFT AND REVISE TREATER CROSS OUTLINES.
DAVIDSON J	05/20/23	1.50	1	(ANTHONY VALADEZ) REVISE MOTIONS IN LIMINE.
EINSTEIN J *	05/20/23	5.40	1	(ANTHONY VALADEZ) RESEARCH CASE LAW RE: VERDICT FORMS.
EINSTEIN J *	05/20/23	1.00	1	(ANTHONY VALADEZ) REVIEW EXPERT PRIOR TESTIMONY.
LEIBOVITZ A	05/20/23	1.90	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF OPENING DECK (0.8); PREPARE KEY DEFENDANTS' EXHIBITS FOR OPENING (0.9); REVIEW KEY PLEADINGS (0.2).
MAHADEVAN V	05/20/23	5.10	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION TRIAL EXHIBITS.
MARTIN SE	05/20/23	3.10	1	(ANTHONY VALADEZ) PREPARATION OF COMPANY DOCUMENTS FOR OPENING PRESENTATION (2.1); CORRESPONDENCE WITH K. FRAZIER RE: DISCLOSURE OF DOCUMENTS (0.4); ORGANIZE COMPLETION OF TRIAL PRINTS (0.6).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN ZW	05/20/23	2.10	1	(ANTHONY VALADEZ) DRAFT OPPOSITION TO MIL.
SCHWARTZ JM	05/20/23	1.20	1	(ANTHONY VALADEZ) REVISE OPPOSITION TO PLAINTIFF'S MOTION IN LIMINE.
TRANGLE AS	05/20/23	0.90	1	(ANTHONY VALADEZ) RESEARCH CASE LAW FOR TRIAL BRIEF.
WYATT GM	05/20/23	0.60	1	(ANTHONY VALADEZ) PREPARE FOR HEARING ON MOTIONS.
WYATT GM	05/20/23	0.20	1	(ANTHONY VALADEZ) COMMUNICATION WITH COURT RE: MOTION TO COMPEL.
WYATT GM	05/20/23	0.40	1	(ANTHONY VALADEZ) COMMUNICATION WITH PLAINTIFF'S COUNSEL RE: MEET AND CONFER ON JURY INSTRUCTIONS.
WYATT GM	05/20/23	0.20	1	(ANTHONY VALADEZ) ANALYZE SUPPLEMENTAL OPPOSITION TO MIL.
BALZANO AJ	05/21/23	7.60	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BROWN AM	05/21/23	8.00	1	(ANTHONY VALADEZ) PREPARE OPENING.
COGSWELL S	05/21/23	7.70	1	(ANTHONY VALADEZ) REVISE TREATER CROSS EXAMINATION OUTLINE (5.3); REVIEW MEDICAL RECORDS IN CONNECTION WITH SAME (2.4).
LEIBOVITZ A	05/21/23	13.70	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF OPENING DECK (5.2); PREPARE DEFENDANTS' EXHIBITS (4.1); REVIEW KEY PLEADINGS (0.8); PREPARE KEY EXPERT MATERIALS FOR ATTORNEY REVIEW (3.6).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN SE	05/21/23	9.10	1	(ANTHONY VALADEZ) REVIEW OPENING STATEMENT (3.6); ORGANIZE DOCUMENTS RELATING TO PLAINTIFF'S OPENING FOR FURTHER ATTORNEY REVIEW (1.7); CORRESPONDENCE WITH B. RITZERT (K&S) RE: UPDATES TO MEDICAL RECORD ANALYSIS (0.7); REVIEW DEPOSITION TRANSCRIPTS (1.1); COORDINATION WITH A. BROWN AND K. MULLALEY RE: EXCHANGE OF OPENING STATEMENTS AND DOCUMENTS WITH PLAINTIFF'S COUNSEL (0.6); COMPILE EXPERT VIDEO FOR USE IN OPENING STATEMENTS (0.7); COORDINATION WITH T. KOESTER RE: TRIAL LOGISTICS (0.7).
MARTIN ZW	05/21/23	1.70	1	(ANTHONY VALADEZ) REVISE OPPOSITION TO MIL.
MULLALEY CI	05/21/23	11.70	1	(ANTHONY VALADEZ) REVISE OPENING SLIDES (4.1), CONFER WITH S. MARTIN RE: OPENING DISCLOSURE (0.6), REVIEW ADMISSIBILITY ISSUES (3.4), REVIEW FACTUAL RESEARCH (2.7), CONFER WITH J. CHABOT AND A. LEWIS RE: OPENING SLIDES (0.9).
SILVERSTEIN RA	05/21/23	0.30	1	(ANTHONY VALADEZ) READ MOTION TO EXCLUDE.
SILVERSTEIN RA	05/21/23	0.20	1	(ANTHONY VALADEZ) REVIEW MIL.
SILVERSTEIN RA	05/21/23	1.90	1	(ANTHONY VALADEZ) REVIEW PRIOR EXPERT TRANSCRIPTS.
SILVERSTEIN RA	05/21/23	0.70	1	(ANTHONY VALADEZ) REVISE EXPERT CROSS OUTLINE.
TAGLIENTI CG	05/21/23	0.70	1	(ANTHONY VALADEZ) REVIEW MATERIALS IN CONNECTION WITH MOTION IN LIMINE.
TRANGLE AS	05/21/23	1.60	1	(ANTHONY VALADEZ) DRAFT SUMMARIES OF CASES FOR USE IN REPLY BRIEF RE MOTION TO EXCLUDE.
WYATT GM	05/21/23	2.00	1	(ANTHONY VALADEZ) PREPARE FOR HEARING ON MOTIONS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BAGGETTA B	05/22/23	1.80	1	(ANTHONY VALADEZ) FINALIZE OPPOSITIONS TO PLAINTIFF'S MOTIONS IN LIMINE (1.8).
BALZANO AJ	05/22/23	11.50	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BROWN AM	05/22/23	15.50	1	(ANTHONY VALADEZ) PARTICIPATE IN JURY SELECTION (5.0) AND PREPARE FOR OPENING (10.5).
COGSWELL S	05/22/23	8.70	1	(ANTHONY VALADEZ) REVISE EXPERT CROSS OUTLINES (4.3). REVIEW SIMILAR TRIAL TRANSCRIPTS IN CONNECTION WITH REVIEW OF PLAINTIFF'S PROPOSED OPENING (3.1). REVIEW MEDICAL RECORDS (1.3).
EINSTEIN J *	05/22/23	11.60	1	(ANTHONY VALADEZ) REVIEW PRIOR EXPERT TESTIMONY IN CONNECTION WITH CROSS- EXAMINATION OUTLINES.
KARP AM	05/22/23	0.80	1	(ANTHONY VALADEZ) CONFER WITH C. MULLALEY AND S. MARTIN REGARDING IDENTIFYING DOCUMENTS FOR EXHIBIT LIST.
LEIBOVITZ A	05/22/23	13.10	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF OPENING DECK (4.7); PREPARE KEY DEFENDANTS' EXHIBITS (3.6); REVISE EXHIBIT LIST (1.4); REVIEW KEY PLEADINGS (0.7); ANALYZE MEDICAL RECORDS (1.2).
LOFFELMAN KL	05/22/23	0.90	1	(ANTHONY VALADEZ) RESEARCH PRECEDENT RE: DISCOVERY ISSUES.
LOFFELMAN KL	05/22/23	1.70	1	(ANTHONY VALADEZ) REVISE OPPOSITION TO PLAINTIFF'S MOTION IN LIMINE (1.3); DRAFT EXHIBITS TO SAME (0.4).
MAHADEVAN V	05/22/23	3.10	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION TRIAL EXHIBITS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN SE	05/22/23	12.60	1	(ANTHONY VALADEZ) ORGANIZATION OF LITERATURE FOR FURTHER ATTORNEY REVIEW (2.2); ASSIST WITH PRODUCTION OF OPENING SLIDES AND SUPPORTING DOCUMENTS TO PLAINTIFF'S COUNSEL (0.9); ANALYZE PROPOSED OPENING SLIDES FROM PLAINTIFFS (3.6) AND COMPILE CITED DOCUMENTS FOR FURTHER ATTORNEY REVIEW (3.1); REVIEW RULINGS ON MOTIONS TO COMPEL (2.1); COMPILE COMPANY DOCUMENTS IN PREPARATION FOR OPENINGS (0.7).
MCNULTY PA	05/22/23	0.20	1	(ANTHONY VALADEZ) REVIEW REQUEST RE: DATABASE.
MULLALEY CI	05/22/23	15.40	1	(ANTHONY VALADEZ) CALL WITH A. BROWN RE: OPENING (0.7), REVISE OPENING SLIDES (4.8), REVIEW PLAINTIFF'S OPENING SLIDES (3.1), REVIEW DOCUMENTS CITED IN PLAINTIFF'S OPENING SLIDES (2.9), RESEARCH RESPONSES TO DOCUMENTS REFERENCE IN PLAINTIFF'S OPENING SLIDES (3.9).
ROSE NR	05/22/23	2.30	1	(ANTHONY VALADEZ) EDIT STRATEGY MEMO FOR RE: DISCOVERY ISSUES (1.9) AND RELATED COMMUNICATIONS WITH G. WYATT RE: STRATEGY FOR ARGUMENT (0.4).
SILVERSTEIN RA	05/22/23	2.50	1	(ANTHONY VALADEZ) REVIEW EXPERT TRANSCRIPT.
SILVERSTEIN RA	05/22/23	2.40	1	(ANTHONY VALADEZ) REVIEW EXPERT DEPOSITIONS AND TRIAL TRANSCRIPTS.
WYATT GM	05/22/23	0.20	1	(ANTHONY VALADEZ) ANALYZE ORDER ON MOTIONS TO COMPEL.
WYATT GM	05/22/23	7.00	1	(ANTHONY VALADEZ) PREPARE FOR MOTIONS HEARING.
WYATT GM	05/22/23	1.50	1	(ANTHONY VALADEZ) ATTEND HEARING RE: TRIAL.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	05/22/23	0.30	1	(ANTHONY VALADEZ) RESEARCH DISCOVERY ISSUES.
BALZANO AJ	05/23/23	4.10	1	(ANTHONY VALADEZ) DRAFT SUMMARY OF EXPERT METHODOLOGY.
BALZANO AJ	05/23/23	4.10	1	(ANTHONY VALADEZ) REVIEW DOCUMENTS RE: EXPERT MATTERS.
BALZANO AJ	05/23/23	4.30	1	(ANTHONY VALADEZ) DRAFT ANALYSIS OF PRIOR TESTIMONY.
BROWN AM	05/23/23	15.00	1	(ANTHONY VALADEZ) PARTICIPATE IN JURY SELECTION (5.0) AND PREPARE FOR OPENING (10.0).
COGSWELL S	05/23/23	11.50	1	(ANTHONY VALADEZ) REVIEW PLAINTIFF'S PROPOSED OPENING (4.1). ANALYZE FACTUAL RESEARCH (2.7). REVIEW MEDICAL RECORDS IN CONNECTION WITH EXPERT OUTLINE (4.7).
EINSTEIN J *	05/23/23	10.00	1	(ANTHONY VALADEZ) REVIEW EXPERT PRIOR TESTIMONY FOR CROSS EXAMINATION OUTLINE (5.9). ANALYZE COMPANY WITNESS DESIGNATIONS (1.9). DRAFT PROPOSED JURY INSTRUCTIONS (1.6).
GALLAGHER P	05/23/23	0.20	1	(ANTHONY VALADEZ) PHONE CALL WITH G. WYATT REGARDING CONDUCTING LEGAL RESEARCH ON JURY INSTRUCTIONS.
GALLAGHER P	05/23/23	0.80	1	(ANTHONY VALADEZ) DRAFT CORRESPONDENCE TO G. WYATT SUMMARIZING RESEARCH ON JURY INSTRUCTIONS.
GALLAGHER P	05/23/23	4.00	1	(ANTHONY VALADEZ) CONDUCT LEGAL RESEARCH FOR CASELAW ON JURY INSTRUCTION..



**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

LEIBOVITZ A	05/23/23	14.30	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF OPENING DECK (3.1); PREPARE DEFENDANTS' EXHIBITS (1.1); REVISE EXHIBIT LIST (0.9); REVIEW KEY PLEADINGS (1.4); ANALYZE MEDICAL RECORDS (1.7); ASSIST WITH PREPARATION OF OUTLINE FOR CROSS-EXAMINATION OF EXPERT (6.1).
MARTIN SE	05/23/23	9.80	1	(ANTHONY VALADEZ) COORDINATE TRIAL SITE LOGISTICS FOR TRIAL TEAM (1.7); ASSIST WITH REVISIONS TO OPENING SLIDES (2.8); REVIEW COMPANY DOCUMENTS FOR OPENING STATEMENTS (1.3); COMPILE TRIAL TRANSCRIPTS FOR DATABASE (0.8); REVIEW COMPANY WITNESS DESIGNATIONS IN PREPARATION FOR FILING (2.6); CORRESPONDENCE WITH A. LEIBOVITZ RE: EXPERT STRATEGY (0.6).
MARTIN ZW	05/23/23	1.90	1	(ANTHONY VALADEZ) DRAFT POTENTIAL TRIAL MOTION.
MULLALEY CI	05/23/23	10.20	1	(ANTHONY VALADEZ) REVISE OPENING SLIDES (1.2), MEET WITH A. BROWN RE: OPENING (0.8), CONFER WITH A. BALZANO, J. EINSTEIN, AND S. COGSWELL RE OPENING RESEARCH (1.1), MEET WITH M. BROWN, A. BROWN, S. RICHMAN AND L. MCEVOY RE EXPERT ANALYSES (0.7), REVIEW PLAINTIFF'S OPENING SLIDES (1.7), DRAFT OBJECTIONS RE SAME (2.8), DRAFT RESPONSES TO PLAINTIFF'S OBJECTIONS TO DEFENDANTS' OPENING SLIDES (1.9).
SILVERSTEIN RA	05/23/23	0.40	1	(ANTHONY VALADEZ) REVIEW EXPERT DEPOSITION TRANSCRIPTS.
SILVERSTEIN RA	05/23/23	0.20	1	(ANTHONY VALADEZ) REVIEW CIRCULATED EXHIBIT LIST.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

SILVERSTEIN RA	05/23/23	0.10	1	(ANTHONY VALADEZ) REVIEW EMAILS FROM C. MULLALEY CONCERNING OPENING SLIDES.
WYATT GM	05/23/23	5.90	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS TO JURY INSTRUCTIONS.
WYATT GM	05/23/23	4.30	1	(ANTHONY VALADEZ) DRAFT OBJECTIONS TO PLAINTIFF'S OPENING SLIDES.
WYATT GM	05/23/23	0.20	1	(ANTHONY VALADEZ) ANALYZE EXPERT MATERIALS RE: MOTION TO EXCLUDE.
BALZANO AJ	05/24/23	1.60	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BALZANO AJ	05/24/23	0.90	1	(ANTHONY VALADEZ) REVIEW EXPERT'S PRIOR TESTIMONY.
BALZANO AJ	05/24/23	9.30	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BALZANO AJ	05/24/23	2.00	1	(ANTHONY VALADEZ) REVIEW EXPERT CROSS EXAMINATION OUTLINE.
BROWN AM	05/24/23	16.80	1	(ANTHONY VALADEZ) PARTICIPATE IN JURY SELECTION (5.0) AND PREPARE FOR OPENING (11.8).
COGSWELL S	05/24/23	9.40	1	(ANTHONY VALADEZ) REVIEW MEDICAL RECORDS IN CONNECTION WITH HEARING (1.6). REVISE EXPERT CROSS EXAMINATION OUTLINE (4.7). REVIEW COMPANY DOCUMENTS IN CONNECTION WITH CROSS EXAMINATION OUTLINES (3.1).
EINSTEIN J *	05/24/23	11.90	1	(ANTHONY VALADEZ) REVIEW DEPOSITION TRANSCRIPTS FOR OPENING SLIDES (2.8). SUMMARIZE HISTORICAL TESTIMONY (1.2). SUMMARIZE WITNESS DEPOSITION TRANSCRIPTS (7.9).
KARP AM	05/24/23	1.60	1	(ANTHONY VALADEZ) CONFER WITH G. WYATT AND Z. MARTIN REGARDING POTENTIAL MOTION.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

KARP AM	05/24/23	0.30	1	(ANTHONY VALADEZ) CONFER WITH S. MARTIN AND C. MULLALEY REGARDING PREPARING WITNESS.
LEIBOVITZ A	05/24/23	13.50	1	(ANTHONY VALADEZ) PREPARE DEFENDANTS' EXHIBITS (1.2); REVISE EXHIBIT LIST (0.9); PREPARE DEFENDANTS' FIRST AMENDED EXHIBIT LIST FOR FILING (3.4); ASSIST WITH PREPARATION OF OBJECTIONS/COUNTERS TO PLAINTIFF'S COMPANY WITNESS DESIGNATIONS (3.3); ASSIST WITH PREPARATION OF OUTLINE FOR CROSS-EXAMINATION OF EXPERT (4.7).
MARTIN SE	05/24/23	10.30	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF OPENING SLIDES AND SUPPORTING DOCUMENTS (3.1); REVIEW COMPANY WITNESS DESIGNATIONS (1.2); FINALIZATION AND SERVICE OF AMENDED EXHIBIT LIST (1.8); COORDINATION WITH J. ROMANO (K&S) RE: SAME (0.6); COMPILE PRIOR WORK PRODUCT IN CONNECTION WITH PREPARING COMPANY WITNESS FOR TRIAL TESTIMONY (2.7); ATTENTION TO TRIAL SITE LOGISTICS (0.9).
MARTIN ZW	05/24/23	3.50	1	(ANTHONY VALADEZ) LEGAL RESEARCH RE: POTENTIAL TRIAL BRIEF.
MARTIN ZW	05/24/23	3.50	1	(ANTHONY VALADEZ) DRAFT POTENTIAL TRIAL MOTION.
MULLALEY CI	05/24/23	10.40	1	(ANTHONY VALADEZ) REVISE OPENING SLIDES (8.4), COMMUNICATE WITH A. BALZANO RE: EXPERT OUTLINE (1.2), COMMUNICATE WITH A. BROWN RE: OPENING (0.8).
SILVERSTEIN RA	05/24/23	0.20	1	(ANTHONY VALADEZ) CONDUCT FACTUAL RESEARCH IN SUPPORT OF TRIAL PREPARATION.
SILVERSTEIN RA	05/24/23	0.20	1	(ANTHONY VALADEZ) REVIEW INSTRUCTIONS CONCERNING RESEARCH FOR POTENTIAL MOTION.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

SILVERSTEIN RA	05/24/23	0.50	1	(ANTHONY VALADEZ) REVIEW CIRCULATED DAY NINE JURY SELECTION TRIAL TRANSCRIPT.
WYATT GM	05/24/23	0.70	1	(ANTHONY VALADEZ) ASSIST WITH RESEARCH FOR TRIAL.
WYATT GM	05/24/23	0.40	1	(ANTHONY VALADEZ) RESEARCH RE: POTENTIAL MOTION.
WYATT GM	05/24/23	2.80	1	(ANTHONY VALADEZ) DRAFT OBJECTION TO DEPOSITION DESIGNATION OF COMPANY WITNESS.
WYATT GM	05/24/23	0.80	1	(ANTHONY VALADEZ) ATTEND COURT HEARINGS.
WYATT GM	05/24/23	4.00	1	(ANTHONY VALADEZ) PREPARE FOR COURT HEARINGS.
BALZANO AJ	05/25/23	6.10	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BALZANO AJ	05/25/23	1.60	1	(ANTHONY VALADEZ) MEETING WITH TEAM RE: CROSS OUTLINES.
BROWN AM	05/25/23	12.00	1	(ANTHONY VALADEZ) PARTICIPATE IN JURY SELECTION (5.0) AND PREPARE FOR OPENING (7.0).
CARUSO JA*	05/25/23	5.90	1	(ANTHONY VALADEZ) ANALYZE MATERIALS FOR WITNESS PREPARATION (2.9). CONFER WITH A. KARP RE: SAME (0.2). REVIEW PRIOR TRIAL TESTIMONY (2.8).
COGSWELL S	05/25/23	4.70	1	(ANTHONY VALADEZ) REVIEW MEDICAL RECORDS IN CONNECTION WITH FACTUAL ANALYSIS (3.1). MEET WITH TRIAL TEAM RE TRIAL STRATEGY (1.6).
EINSTEIN J *	05/25/23	9.00	1	(ANTHONY VALADEZ) REVIEW WITNESS DEPOSITION TESTIMONY (2.1). RESEARCH FACTUAL BACKGROUND INFORMATION (2.5). DRAFT EXPERT CROSS EXAMINATION OUTLINE (3.9). RESEARCH EXPERT MATTERS (0.5).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

KARP AM	05/25/23	2.00	1	(ANTHONY VALADEZ) REVIEW DOCUMENTS IN CONNECTION WITH POTENTIAL MOTION (1.7), AND CONFER WITH L. ALEXANIAN AND A. LEIBOVITZ REGARDING SAME (0.3).
KARP AM	05/25/23	0.20	1	(ANTHONY VALADEZ) MEET WITH J. CARUSO REGARDING COMPANY WITNESS.
LEIBOVITZ A	05/25/23	9.10	1	(ANTHONY VALADEZ) PREPARE DEFENDANTS' EXHIBITS (1.2); REVISE EXHIBIT LIST (0.6); PREPARE PLAINTIFF'S AND RETAILERS' EXHIBITS FOR ATTORNEY REVIEW (2.6); ASSIST WITH PREPARATION OF OUTLINE FOR CROSS-EXAMINATION OF EXPERT (4.7).
MARTIN SE	05/25/23	6.00	1	(ANTHONY VALADEZ) CONFER WITH K&S RE: OBJECTIONS TO COMPANY WITNESS DESIGNATIONS (0.8); COORDINATION WITH SIDLEY AUSTIN RE: RETRIEVAL OF WITNESS VIDEOS (1.3); MEET WITH A. BROWN, M. BROWN, S. RICHMAN ET AL RE: TRIAL STRATEGY FOR OUTLINES (1.6); REVIEW EXPERT TESTIMONY AND REPORTS (2.3).
MARTIN ZW	05/25/23	0.10	1	(ANTHONY VALADEZ) REVIEW EMAIL MEMO FROM R. SILVERSTEIN RE: LEGAL RESEARCH FOR POTENTIAL TRIAL MOTION.
MULLALEY CI	05/25/23	11.10	1	(ANTHONY VALADEZ) REVISE OPENING SLIDES (4.1), MEET WITH A. BROWN, S. RICHMAN, M. BROWN, A. BALZANO, S. COGSWELL, S. MARTIN AND A. LEIBOVITZ RE: EXPERT CROSS EXAMINATIONS (1.6), DRAFT EXPERT CROSS EXAMINATION OUTLINE (5.4).
SILVERSTEIN RA	05/25/23	1.90	1	(ANTHONY VALADEZ) ANALYZE RESEARCH RE: EVIDENCE MATTERS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

SILVERSTEIN RA	05/25/23	2.40	1	(ANTHONY VALADEZ) CONDUCT LEGAL RESEARCH FOR POTENTIAL TRIAL MOTION.
SILVERSTEIN RA	05/25/23	1.80	1	(ANTHONY VALADEZ) DRAFT MEMORANDUM SUMMARIZING LEGAL RESEARCH FOR POTENTIAL TRIAL MOTION.
SILVERSTEIN RA	05/25/23	3.90	1	(ANTHONY VALADEZ) CONDUCT LEGAL RESEARCH FOR POTENTIAL TRIAL MOTION.
SILVERSTEIN RA	05/25/23	1.80	1	(ANTHONY VALADEZ) RESEARCH TRIAL MATTERS.
WYATT GM	05/25/23	0.50	1	(ANTHONY VALADEZ) ANALYZE RESEARCH RE: TRIAL.
WYATT GM	05/25/23	0.30	1	(ANTHONY VALADEZ) PREPARE FOR HEARING.
WYATT GM	05/25/23	0.90	1	(ANTHONY VALADEZ) ATTEND TRIAL HEARING.
WYATT GM	05/25/23	0.30	1	(ANTHONY VALADEZ) RESEARCH JURY INSTRUCTIONS.
WYATT GM	05/25/23	0.70	1	(ANTHONY VALADEZ) REVISE OBJECTIONS TO SLIDES.
WYATT GM	05/25/23	1.00	1	(ANTHONY VALADEZ) RESEARCH CASE STRATEGY.
WYATT GM	05/25/23	1.40	1	(ANTHONY VALADEZ) TRIAL STRATEGY MEETING.
WYATT GM	05/25/23	0.10	1	(ANTHONY VALADEZ) ANALYZE RESEARCH RE: ADMISSIBILITY OF TESTIMONY.
BALZANO AJ	05/26/23	0.80	1	(ANTHONY VALADEZ) DRAFT BRIEF RE: TRIAL EVIDENCE.
BALZANO AJ	05/26/23	3.30	1	(ANTHONY VALADEZ) DRAFT EMAIL SUMMARIZING COMPANY WITNESS DEPOSITION DESIGNATIONS.
BROWN AM	05/26/23	9.00	1	(ANTHONY VALADEZ) PREPARE FOR OPENING (5.3), PREPARE FOR EXPERT CROSS (3.7).
CARUSO JA*	05/26/23	4.70	1	(ANTHONY VALADEZ) ANALYZE COMPANY DOCUMENTS AND PRIOR TESTIMONY RELEVANT TO COMPANY WITNESS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

COGSWELL S	05/26/23	5.00	1	(ANTHONY VALADEZ) CONTINUE TO REVIEW MEDICAL RECORDS IN CONNECTION WITH DRAFTING ANALYSIS.
EINSTEIN J *	05/26/23	9.70	1	(ANTHONY VALADEZ) REVIEW EXPERT TESTIMONY IN CONNECTION WITH CROSS-EXAMINATION OUTLINE (1.8). RESEARCH CALIFORNIA LAW RE: TRIAL EVIDENCE (2.2). RESEARCH CASE LAW RE: TRIAL MATTERS (3.2). RESEARCH CALIFORNIA CASE LAW RE: DEPOSITION DESIGNATIONS (2.5).
GALLAGHER P	05/26/23	0.20	1	(ANTHONY VALADEZ) CONFER WITH G. WYATT REGARDING TIME LIMITS.
GALLAGHER P	05/26/23	0.10	1	(ANTHONY VALADEZ) CORRESPOND WITH TRIAL TEAM REGARDING EVIDENCE MATTERS.
KARP AM	05/26/23	3.80	1	(ANTHONY VALADEZ) CONFER WITH A. BROWN AND C. MULLALEY REGARDING REVIEW OF FACTUAL INFORMATION IN CONNECTION WITH TRIAL.
KARP AM	05/26/23	0.70	1	(ANTHONY VALADEZ) CONFER WITH S. MARTIN REGARDING MATERIALS FOR COMPANY WITNESS.
LEIBOVITZ A	05/26/23	6.70	1	(ANTHONY VALADEZ) PREPARE DEFENDANTS' EXHIBITS (1.2); REVISE EXHIBIT LIST (0.8); REVIEW KEY PLEADINGS (0.4); ASSIST WITH PREPARATION OF OUTLINE FOR CROSS-EXAMINATION OF EXPERT (4.3).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN SE	05/26/23	6.00	1	(ANTHONY VALADEZ) COMPILE TRIAL EXHIBIT LISTS FOR FURTHER ATTORNEY REVIEW IN CONNECTION WITH WITNESS PREP (1.2); REVIEW KEY DOCUMENTS FOR FURTHER ATTORNEY REVIEW IN CONNECTION WITH RESPONDING TO PLAINTIFF'S OPENING (2.3); COORDINATION WITH A. KARP RE: PREPARATION OF COMPANY WITNESS (0.7); COMPILE PRIOR WORK PRODUCT REGARDING COMPANY WITNESS FOR FURTHER ATTORNEY REVIEW (0.4); COORDINATION WITH B. RITZERT (K&S) RE: UPDATES TO MEDICAL RECORDS ANALYSIS (0.6); CORRESPONDENCE WITH G. WYATT RE EXPERT DESIGNATIONS (0.8).
MARTIN ZW	05/26/23	0.90	1	(ANTHONY VALADEZ) REVIEW OPP'N TO MOTION IN LIMINE AND OUTLINE REPLY IN SUPPORT.
MARTIN ZW	05/26/23	0.60	1	(ANTHONY VALADEZ) RESEARCH JURY INSTRUCTIONS.
MULLALEY CI	05/26/23	8.20	1	(ANTHONY VALADEZ) REVISE OPENING SLIDES (1.2), REVIEW EXPERT REPORTS AND SHEETS (3.2), COMMUNICATE WITH A. BROWN AND A. KARP RE: TRIAL STRATEGY (3.8).
SILVERSTEIN RA	05/26/23	1.40	1	(ANTHONY VALADEZ) RESEARCH CASE LAW RE TRIAL ISSUES.
SILVERSTEIN RA	05/26/23	0.10	1	(ANTHONY VALADEZ) REVIEW EMAIL FROM Z. MARTIN CONCERNING RESEARCH FOR REPLY IN SUPPORT OF MOTION IN LIMINE.
WYATT GM	05/26/23	0.90	1	(ANTHONY VALADEZ) COMMUNICATION WITH COURT RE: JURY INSTRUCTIONS.
WYATT GM	05/26/23	1.10	1	(ANTHONY VALADEZ) ANALYZE OPPOSITION TO MOTION IN LIMINE (0.9) AND COMMUNICATION WITH Z. MARTIN RE: REPLY TO SAME (0.2).



**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	05/26/23	0.80	1	(ANTHONY VALADEZ) COMMUNICATION WITH COURT AND TEAM RE: WITNESS DESIGNATIONS.
WYATT GM	05/26/23	0.20	1	(ANTHONY VALADEZ) COMMUNICATION WITH TRIAL TEAM RE: SUBMISSION OF WITNESS DESIGNATIONS.
WYATT GM	05/26/23	0.20	1	(ANTHONY VALADEZ) DRAFT BRIEF RE: MOTION IN LIMINE.
BALZANO AJ	05/27/23	0.80	1	(ANTHONY VALADEZ) DRAFT TRIAL BRIEF.
CARUSO JA*	05/27/23	1.50	1	(ANTHONY VALADEZ) REVIEW AND ANALYZE EVIDENCE MATTERS.
COGSWELL S	05/27/23	1.70	1	(ANTHONY VALADEZ) CONTINUE TO REVIEW AND DRAFT SUMMARY OF INSURANCE RECORDS.
EINSTEIN J *	05/27/23	1.50	1	(ANTHONY VALADEZ) RESEARCH CASE LAW RE: POTENTIAL PLEADING.
GALLAGHER P	05/27/23	0.10	1	(ANTHONY VALADEZ) CORRESPONDENCE TO C. MULLALEY AND S. MARTIN REGARDING POTENTIAL MOTION.
KARP AM	05/27/23	0.50	1	(ANTHONY VALADEZ) REVIEW DATA IN CONNECTION WITH PLAINTIFF CLAIMS.
MARTIN SE	05/27/23	1.00	1	(ANTHONY VALADEZ) ASSIST WITH PLANNING AND PREPARATION FOR TRIAL (0.9); CORRESPONDENCE WITH P. GALLAGHER RE: SAME (0.1).
MARTIN ZW	05/27/23	3.30	1	(ANTHONY VALADEZ) DRAFT REPLY ISO BRIEF.
TRANGLE AS	05/27/23	2.40	1	(ANTHONY VALADEZ) RESEARCH CASES RELATED TO MOTION TO EXCLUDE REPLY.
WYATT GM	05/27/23	0.20	1	(ANTHONY VALADEZ) COMMUNICATION WITH Z. MARTIN RE: OUTLINE OF REPLY IN SUPPORT OF MOTION TO EXCLUDE.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BALZANO AJ	05/28/23	1.10	1	(ANTHONY VALADEZ) REVIEW COMPANY DOCUMENTS RELIED ON BY EXPERT.
BALZANO AJ	05/28/23	3.20	1	(ANTHONY VALADEZ) REVIEW PRIOR WITNESS TESTIMONY.
BALZANO AJ	05/28/23	8.00	1	(ANTHONY VALADEZ) DRAFT BRIEF RE: EVIDENCE MATTERS.
BRADY PE*	05/28/23	3.60	1	(ANTHONY VALADEZ) REVIEW PRIOR WITNESS TESTIMONY.
CARUSO JA*	05/28/23	11.40	1	(ANTHONY VALADEZ) CONDUCT RESEARCH FOR OPENING (7.3). REVIEW PRIOR EXPERT TESTIMONY IN CONNECTION WITH OPENING AND CROSS-EXAMINATION OUTLINES (4.1).
COGSWELL S	05/28/23	7.30	1	(ANTHONY VALADEZ) REVIEW PRIOR EXPERT MATERIALS IN CONNECTION WITH OPENING PROJECTS (4.1) FINISH SUMMARIZING MEDICAL RECORDS (3.2).
DAVIDSON J	05/28/23	0.80	1	(ANTHONY VALADEZ) REVISE BRIEF.
EINSTEIN J *	05/28/23	6.00	1	(ANTHONY VALADEZ) REVIEW PRIOR CASE TRANSCRIPTS (3.5); SUMMARIZE SAME (1.3). SUMMARIZE PRIOR EXPERT TESTIMONY IN CONNECTION WITH CROSS-EXAMINATION OUTLINE (1.2).
GALLAGHER P	05/28/23	1.60	1	(ANTHONY VALADEZ) DRAFT MOTION.
GALLAGHER P	05/28/23	1.30	1	(ANTHONY VALADEZ) CONDUCT LEGAL RESEARCH IN SUPPORT OF MOTION.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

LEIBOVITZ A	05/28/23	10.40	1	(ANTHONY VALADEZ) PREPARE DEFENDANTS' EXHIBITS (1.2); REVISE EXHIBIT LIST (0.2); PREPARE EXPERT RELIANCE MATERIALS FOR ATTORNEY REVIEW(3.2); ASSIST WITH PREPARATION OF OUTLINE FOR CROSS-EXAMINATION OF EXPERT (3.7); PREPARE WITNESS DEPOSITION DESIGNATIONS FOR ATTORNEY REVIEW (2.1).
MARTIN SE	05/28/23	8.10	1	(ANTHONY VALADEZ) ASSIST WITH PLANNING AND PREPARATION FOR TRIAL; RESEARCH IN PREPARATION FOR OPENING STATEMENTS; DRAFT EMAIL TO A. BROWN AND COMPILE TRIAL EXHIBITS RE: SAME; COMPILE AND RE-ORGANIZE SUPPLEMENTAL DOCUMENTS RE OPENING STATEMENTS; REVIEW AND CIRCULATE UPDATED MEDICAL INFORMATION TO TRIAL TEAM; CORRESPONDENCE WITH A. KARP AND K. MULLALEY RE: OPENING; CORRESPONDENCE AND COORDINATION WITH A. LEIBOVITZ RE: COMPILING TRIAL MATERIALS; COORDINATION WITH A. LEIBOVITZ RE: REVISIONS TO TRIAL EXHIBIT LIST; COMPILE PRODUCTION TO BE SENT TO T. KOESTER (NELSON MULLINS) FOR REVIEW.
MARTIN ZW	05/28/23	2.40	1	(ANTHONY VALADEZ) DRAFT REPLY IN SUPPORT OF BRIEF.
MULLALEY CI	05/28/23	7.40	1	(ANTHONY VALADEZ) REVISE OPENING SLIDES (1.6), REVIEW EXPERT PRIOR STATEMENTS (2.3), COMMUNICATE WITH A. BROWN RE: SAME (0.4), REVIEW COMPANY DOCUMENTS FOR OPENING (1.2), REVIEW FACTUAL RESEARCH AND ANALYSIS (1.9).
WYATT GM	05/28/23	0.20	1	(ANTHONY VALADEZ) COMMUNICATION WITH J. DAVIDSON AND P. GALLAGHER RE: REVISIONS TO BRIEFS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BALZANO AJ	05/29/23	6.10	1	(ANTHONY VALADEZ) DRAFT BRIEF RE: EVIDENCE MATTERS.
BALZANO AJ	05/29/23	1.60	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BALZANO AJ	05/29/23	4.80	1	(ANTHONY VALADEZ) DRAFT EXPERT OUTLINE.
BROWN AM	05/29/23	16.00	1	(ANTHONY VALADEZ) PREPARING FOR OPENING (11.0) JURY SELECTION (5.0).
CARUSO JA*	05/29/23	6.50	1	(ANTHONY VALADEZ) CONDUCT RESEARCH FOR OPENING (2.9). REVIEW PRIOR EXPERT TESTIMONY IN CONNECTION WITH OPENING AND CROSS-EXAMINATION OUTLINES (3.6).
COGSWELL S	05/29/23	12.30	1	(ANTHONY VALADEZ) REVISE EXPERT CROSS OUTLINES (8.2). CONDUCT BACKGROUND RESEARCH RE: SAME (4.1).
DAVIDSON J	05/29/23	0.80	1	(ANTHONY VALADEZ) REVISE MOTION IN LIMINE REPLY.
EINSTEIN J *	05/29/23	10.40	1	(ANTHONY VALADEZ) REVIEW PRIOR CASE TRANSCRIPTS (2.9). SUMMARIZE PRIOR EXPERT TESTIMONY IN CONNECTION WITH CROSS-EXAMINATION OUTLINE (3.1). RESEARCH CASE LAW RE: EVIDENCE MATTERS (4.4).
KARP AM	05/29/23	1.50	1	(ANTHONY VALADEZ) CONFER WITH S. MARTIN REGARDING OPENING STATEMENTS.
KARP AM	05/29/23	2.00	1	(ANTHONY VALADEZ) CONFER WITH S. MARTIN REGARDING OPENING STATEMENTS.
LEIBOVITZ A	05/29/23	13.70	1	(ANTHONY VALADEZ) PREPARE DEFENDANTS' EXHIBITS (2.9); REVISE EXHIBIT LIST (0.3); PREPARE EXPERT MATERIALS FOR ATTORNEY REVIEW (5.7); ASSIST WITH PREPARATION OF OUTLINE FOR CROSS-EXAMINATION OF EXPERT (4.8).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN SE	05/29/23	10.40	1	(ANTHONY VALADEZ) COMPILE DOCUMENTS FOR COMPANY WITNESS (1.2); COMPILE DOCUMENTS FOR EXPERT OUTLINE (0.8); CORRESPONDENCE WITH J. MORALES (CORE LEGAL) RE: REVISIONS TO TRIAL EXHIBITS (0.6); COMPILE PLEADINGS FOR REVIEW BY A. BALZANO (0.6); COMPILE MATERIALS FROM FACTUAL ANALYSIS FOR FURTHER ATTORNEY REVIEW (1.2); CORRESPONDENCE WITH A. KARP RE: SAME (1.5); REVISE BENCH BRIEF (0.9) AND DRAFT SUPPORTING PAPERS AND COMPILE EXHIBITS RE: SAME (1.3); CORRESPONDENCE WITH G. WYATT, B. PRICE (K&S), AND J. ROMANO (K&S) RE: SAME (0.2); REVIEW UPDATED OPENING STATEMENT FROM J. SATTERLEY (2.1).
MARTIN ZW	05/29/23	0.40	1	(ANTHONY VALADEZ) REVISE REPLY IN SUPPORT OF MOTION IN LIMINE.
MULLALEY CI	05/29/23	8.30	1	(ANTHONY VALADEZ) REVISE OPENING SLIDES (2.8), MEET WITH A. BROWN RE: OPENING (0.9), REVIEW PLAINTIFF'S REVISED OPENING (2.1), DRAFT OBJECTIONS TO PLAINTIFF'S REVISED OPENING SLIDES (1.8), REVIEW FACTUAL ANALYSIS (0.7).
SILVERSTEIN RA	05/29/23	0.20	1	(ANTHONY VALADEZ) REVIEW REPLY IN SUPPORT OF MOTION IN LIMINE MOTION.
WYATT GM	05/29/23	0.80	1	(ANTHONY VALADEZ) REVISE PRETRIAL MOTION.
WYATT GM	05/29/23	0.10	1	(ANTHONY VALADEZ) REVISE ARGUMENT OUTLINE RE: MOTION TO COMPEL.
WYATT GM	05/29/23	4.80	1	(ANTHONY VALADEZ) REVISE PRETRIAL MOTION.
WYATT GM	05/29/23	0.40	1	(ANTHONY VALADEZ) MEETING WITH A. BROWN RE: MOTION STRATEGY.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	05/29/23	0.10	1	(ANTHONY VALADEZ) ANALYZE COURT RULING RE: JURY INSTRUCTIONS.
WYATT GM	05/29/23	4.40	1	(ANTHONY VALADEZ) PREPARE FOR ARGUMENT ON PRETRIAL MOTIONS.
WYATT GM	05/29/23	0.20	1	(ANTHONY VALADEZ) REVISE REPLY IN SUPPORT OF MOTION IN LIMINE MOTION.
BAGGETTA B	05/30/23	1.40	1	(ANTHONY VALADEZ) REVISE REPLY IN SUPPORT OF MOTION TO EXCLUDE (1.4).
BALZANO AJ	05/30/23	0.90	1	(ANTHONY VALADEZ) CONDUCT FACTUAL RESEARCH IN SUPPORT OF TRIAL PREPARATION.
BALZANO AJ	05/30/23	8.20	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BALZANO AJ	05/30/23	2.10	1	(ANTHONY VALADEZ) DRAFT BRIEF RE: EVIDENCE MATTERS.
BALZANO AJ	05/30/23	2.90	1	(ANTHONY VALADEZ) REVIEW EXPERT REPORTS IN SUPPORT OF OPENING.
BROWN AM	05/30/23	16.00	1	(ANTHONY VALADEZ) PREPARE FOR OPENING.
BYLER KM	05/30/23	1.20	1	(ANTHONY VALADEZ) ANALYZE DEPOSITION TESTIMONY FOR REPLY IN SUPPORT OF MOTION TO EXCLUDE.
CARUSO JA*	05/30/23	14.60	1	(ANTHONY VALADEZ) ANALYZE PLAINTIFF'S OPENING SLIDES (2.7). DEVELOP FACTUAL SUMMARIES IN SUPPORT OF OPENING (8.8). PREPARE EXPERT CROSS OUTLINE (3.1).
COGSWELL S	05/30/23	14.80	1	(ANTHONY VALADEZ) REVISE EXPERT OUTLINE (3.2). PERFORM BACKGROUND RESEARCH FOR OUTLINES (8.9). REVIEW NEW MEDICAL RECORDS RECEIVED (2.5).
DAVIDSON J	05/30/23	1.40	1	(ANTHONY VALADEZ) REVISE REPLY IN SUPPORT OF MOTION TO EXCLUDE (1.1); REVIEW TIME LIMIT ISSUE (0.3).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

EINSTEIN J *	05/30/23	12.00	1	(ANTHONY VALADEZ) REVIEW EXPERT PRIOR TESTIMONY IN CONNECTION WITH CROSS- EXAMINATION OUTLINE (4.8).REVIEW EXPERT REPORTS (4.1). RESEARCH CASE LAW RE: EVIDENCE (1.5). CONDUCT BACKGROUND RESEARCH (0.6). REVIEW RETAILER DISCOVERY RESPONSES (1.0).
KARP AM	05/30/23	1.70	1	(ANTHONY VALADEZ) CONFER WITH A. BROWN AND J. CARUSO REGARDING OPENING STATEMENTS (.3), ANALYZE COMPANY RE: SAME (1.4).
LEIBOVITZ A	05/30/23	15.70	1	(ANTHONY VALADEZ) PREPARE DEFENDANTS' EXHIBITS (1.7); REVISE EXHIBIT LIST (0.9); ASSIST WITH PREPARATION OF OPENING DECK (4.9); PREPARE EXPERT CROSS MATERIALS (8.2).
MARTIN SE	05/30/23	14.80	1	(ANTHONY VALADEZ) REVIEW EXPERT DISCLOSURE DOCUMENTS (1.6); DRAFT INDEX OF SAME (0.5); COMPILE COMPANY DOCUMENTS TO BE USED IN OPPOSITION TO PLAINTIFF'S OPENING STATEMENT (1.3); ASSIST WITH REVISIONS TO TRIAL EXHIBITS AND OPENING STATEMENTS (4.8); RESEARCH RELATED TO PLAINTIFF'S OPENING SLIDES (3.9) AND ASSEMBLE SUPPORTING DOCUMENTATION RE: SAME (2.7).
MULLALEY CI	05/30/23	19.20	1	(ANTHONY VALADEZ) REVISE OPENING SLIDES (3.1), PROOF AND CITE CHECK OPENING SLIDES (2.4), REVIEW RETAILER TESTIMONY AND FACTS (4.1), REVIEW PLAINTIFF'S EXPERT DOCUMENT DISCLOSURES (1.2), DRAFT OBJECTIONS RE: SAME (2.6), REVIEW PLAINTIFF'S REVISED SLIDES AND DOCUMENTS CITED THEREIN (4.7), PULL RESPONSIVE DOCUMENTS FOR OPENING (1.1).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

SCHWARTZ JM	05/30/23	10.50	1	(ANTHONY VALADEZ) DRAFT REPLY IN SUPPORT OF MOTION TO EXCLUDE.
SILVERSTEIN RA	05/30/23	0.30	1	(ANTHONY VALADEZ) REVIEW REPLY IN SUPPORT OF MOTION IN LIMINE.
SILVERSTEIN RA	05/30/23	0.20	1	(ANTHONY VALADEZ) REVIEW PRETRIAL MOTION.
SILVERSTEIN RA	05/30/23	0.20	1	(ANTHONY VALADEZ) REVIEW COURT ORDER ON PLAINTIFFS' MILS.
SILVERSTEIN RA	05/30/23	0.70	1	(ANTHONY VALADEZ) REVIEW PLAINTIFFS' OPENING SLIDES (0.5) AND DISCUSS WITH S. COGSWELL (0.2).
SILVERSTEIN RA	05/30/23	0.10	1	(ANTHONY VALADEZ) REVIEW ORDER RE PRELIMINARY JURY INSTRUCTIONS.
SILVERSTEIN RA	05/30/23	0.30	1	(ANTHONY VALADEZ) REVIEW MEDICAL RECORDS (0.1) AND REVISE EXPERT CROSS ACCORDINGLY (0.2).
SILVERSTEIN RA	05/30/23	0.20	1	(ANTHONY VALADEZ) REVIEW PLAINTIFFS' RESPONSE TO MOTION TO EXCLUDE.
SILVERSTEIN RA	05/30/23	0.30	1	(ANTHONY VALADEZ) REVIEW WITNESS DEPOSITION.
WINSHIP CJ*	05/30/23	0.10	1	(ANTHONY VALADEZ) CONDUCT FACTUAL RESEARCH IN SUPPORT OF TRIAL PREPARATION.
WYATT GM	05/30/23	4.60	1	(ANTHONY VALADEZ) PREPARE FOR ARGUMENT ON PRETRIAL MOTIONS.
WYATT GM	05/30/23	1.50	1	(ANTHONY VALADEZ) PREPARE FOR (0.6) AND ATTEND (0.9) MEET AND CONFER RE: OPENING SLIDES.
WYATT GM	05/30/23	6.00	1	(ANTHONY VALADEZ) ATTEND HEARING ON MOTIONS.
WYATT GM	05/30/23	0.40	1	(ANTHONY VALADEZ) REVISE REPLY IN SUPPORT OF MOTION TO EXCLUDE.



**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	05/30/23	0.40	1	(ANTHONY VALADEZ) COMMUNICATION WITH K. MULLALEY RE: OBJECTIONS TO PLAINTIFF'S EXHIBITS.
WYATT GM	05/30/23	0.50	1	(ANTHONY VALADEZ) RESEARCH FOR POTENTIAL TRIAL MOTION.
BALZANO AJ	05/31/23	6.20	1	(ANTHONY VALADEZ) REVISE WITNESS DESIGNATIONS COUNTERS AND OBJECTIONS.
BALZANO AJ	05/31/23	6.70	1	(ANTHONY VALADEZ) DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BALZANO AJ	05/31/23	0.40	1	(ANTHONY VALADEZ) REVIEW WITNESS PRIOR TESTIMONY.
BROWN AM	05/31/23	16.00	1	(ANTHONY VALADEZ) ATTEND TRIAL (6.2); PREPARE FOR UPCOMING EXPERT CROSS EXAMINATIONS (9.8).
CARUSO JA*	05/31/23	14.30	1	(ANTHONY VALADEZ) DEVELOP FACTUAL SUMMARIES IN SUPPORT OF OPENING (9.2). PREPARE EXPERT CROSS OUTLINE (5.4).
COGSWELL S	05/31/23	14.60	1	(ANTHONY VALADEZ) OBSERVE OPENING STATEMENTS (5.4). REVISE EXPERT OUTLINE (2.8). REVIEW EXPERT DEPOSITION (3.2); AND DRAFT CROSS OUTLINE (2.9).
DAVIDSON J	05/31/23	1.50	1	(ANTHONY VALADEZ) REVISE DEPOSITION DESIGNATIONS.
EINSTEIN J *	05/31/23	9.10	1	(ANTHONY VALADEZ) REVIEW EXPERT PRIOR TESTIMONY FOR CROSS-EXAMINATION OUTLINE (0.3). CONDUCT BACKGROUND FACTUAL RESEARCH (5.9). REVIEW RETAILER DISCOVERY RESPONSES (0.1). ATTENTION TO TRIAL OPENING ARGUMENTS (2.8).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

GALLAGHER P	05/31/23	1.20	1	(ANTHONY VALADEZ) CONDUCT LEGAL RESEARCH IN SUPPORT COUNTER-DESIGNATIONS OF WITNESS DEPOSITION TESTIMONY (0.8), AND REVIEW OBJECTIONS TO PLAINTIFF'S DEPOSITION DESIGNATIONS IN SUPPORT OF THE SAME (0.4).
KARP AM	05/31/23	1.20	1	(ANTHONY VALADEZ) REVIEW TESTIMONY, IN CONNECTION WITH OPENING STATEMENTS.
KARP AM	05/31/23	1.20	1	(ANTHONY VALADEZ) RESEARCH IN CONNECTION WITH OPENING STATEMENTS.
KARP AM	05/31/23	1.70	1	(ANTHONY VALADEZ) CONFER WITH G. WYATT REGARDING POTENTIAL TRIAL MOTION.
LEIBOVITZ A	05/31/23	14.90	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION FOR OPENING ARGUMENTS (3.2); ASSIST WITH PREPARATION OF OUTLINE FOR CROSS-EXAMINATION OF EXPERT (2.4) ; PREPARE KEY RESPONSIVE OPENING DOCUMENTS AND DELIVER TO COURT (2.8); PREPARE EXPERT DISCLOSURE DOCUMENTS (3.7); ASSIST WITH PREPARATION OF AMENDED WITNESS DESIGNATIONS OBJECTIONS AND COUNTERS (2.8).
MARTIN SE	05/31/23	13.30	1	(ANTHONY VALADEZ) PREPARE FOR OPENING STATEMENTS (1.6); PROVIDE SUPPORT FOR OPENING STATEMENTS (5.4); REVIEW EXPERT DOCUMENTS IN PREPARATION FOR CROSS EXAMINATION (6.3).
MARTIN ZW	05/31/23	1.20	1	(ANTHONY VALADEZ) DRAFT MOTION TO EXCLUDE.
MARTIN ZW	05/31/23	0.80	1	(ANTHONY VALADEZ) DRAFT STATEMENT RE: SCOPE OF COUNTER-DESIGNATIONS FOR WITNESS TESTIMONY.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MULLALEY CI	05/31/23	16.10	1	(ANTHONY VALADEZ) ATTEND TRIAL OPENING STATEMENTS (6.2), REVISE OPENING SLIDES (0.7), REVIEW PLAINTIFF'S ADDITIONAL EXPERT DOCUMENT DISCLOSURES (1.2), REVIEW PLAINTIFF'S DIRECT SLIDE DECK DISCLOSURE (2.3), DRAFT OBJECTIONS RE: SAME (4.7), MEET WITH G. WYATT AND S. RICHMAN RE: SAME (0.4), MEET WITH A. WENZCEL RE: EXPERT CROSS EXAMINATION DOCUMENTS (0.6).
SILVERSTEIN RA	05/31/23	0.40	1	(ANTHONY VALADEZ) REVIEW REPLY IN SUPPORT OF MOTION IN LIMINE.
TRANGLE AS	05/31/23	3.30	1	(ANTHONY VALADEZ) REVISE WITNESS OBJECTIONS AND COUNTER-DESIGNATIONS.
TRANGLE AS	05/31/23	2.10	1	(ANTHONY VALADEZ) REVISE WITNESS OBJECTIONS AND COUNTER-DESIGNATIONS.
WYATT GM	05/31/23	6.90	1	(ANTHONY VALADEZ) PREPARE FOR (0.7) AND ATTEND TRIAL (6.2).
WYATT GM	05/31/23	2.40	1	(ANTHONY VALADEZ) REVISE OBJECTIONS AND COUNTERS TO WITNESS.
WYATT GM	05/31/23	1.20	1	(ANTHONY VALADEZ) REVISE WITNESS DESIGNATIONS.
WYATT GM	05/31/23	3.40	1	(ANTHONY VALADEZ) PREPARE FOR HEARING.
2) Travel Time				
LEIBOVITZ A	05/20/23	10.20	2	(ANTHONY VALADEZ) TRAVEL TO OAKLAND TRIAL SITE.
BALZANO AJ	05/21/23	9.30	2	(ANTHONY VALADEZ) TRAVEL FROM NEW YORK TO OAKLAND FOR TRIAL.
COGSWELL S	05/21/23	9.50	2	(ANTHONY VALADEZ) TRAVEL TO TRIAL SITE.
MARTIN SE	05/21/23	8.50	2	(ANTHONY VALADEZ) TRAVEL FROM EWR TO SFO FOR TRIAL.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MULLALEY CI                      05/23/23                      9.20    2                      (ANTHONY VALADEZ) TRAVEL FROM  
BOSTON TO OAKLAND FOR TRIAL.

\* Law clerks are law school graduates who are not presently admitted to practice.

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES  
ATTORNEY WORK PRODUCT  
PRIVILEGED AND CONFIDENTIAL

**Valadez Flat Fee Time Detail for June 1, 2023 - June 30, 2023**

**CLIENT:** 690970 LTL Management LLC  
**MATTER:** 8 Bankruptcy

NAME	DATE	HOURS	TASK	DESCRIPTION
1) Litigation Consulting				
BALZANO AJ	06/01/23	6.70	1	DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BROWN AM	06/01/23	12.00	1	REVISE OPENING (5.0); PREPARE FOR EXPERT WITNESS CROSS EXAMINATION (7.0).
COGSWELL S	06/01/23	9.00	1	ASSIST WITH DESIGNATIONS (1.0); REVIEW MEDICAL RECORDS (3.2); REVISE EXPERT OUTLINE (2.0); DRAFT ADDITIONAL EXPERT CROSS (2.8).
DAVIDSON J	06/01/23	1.80	1	REVISE DEPOSITION DESIGNATIONS.
EINSTEIN J *	06/01/23	9.60	1	PREPARE FOR EXPERT CROSS (3.5); PREPARE FOR ADDITIONAL EXPERT CROSS (6.1).
GALLAGHER P	06/01/23	3.80	1	RESEARCH IN CONNECTION WITH MOTION TO EXCLUDE.
GALLAGHER P	06/01/23	0.50	1	PHONE CALL WITH J. SCHWARTZ AND Z. MARTIN REGARDING RESEARCH FOR MOTIONS TO EXCLUDE.
GALLAGHER P	06/01/23	0.80	1	CONDUCT LEGAL RESEARCH IN CALIFORNIA FOR CASELAW REGARDING MOTION TO EXCLUDE.
LEIBOVITZ A	06/01/23	10.20	1	PREPARE KEY DEFENDANTS' EXHIBITS (5.5); MANAGE KEY PLEADINGS (1.2); ASSIST WITH PREPARATION OF OUTLINE FOR CROSS-EXAMINATION OF EXPERT (3.0); ANALYZE KEY PLAINTIFF MEDICAL RECORDS (0.5).
MARTIN SE	06/01/23	9.60	1	ASSIST WITH PREPARATION FOR EXPERT CROSS (4.6); ATTEND CONTINUED OPENING PRESENTATIONS TO PROVIDE SUPPORT (5.0).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN ZW	06/01/23	3.50	1	DRAFT MOTION TO EXCLUDE.
MARTIN ZW	06/01/23	3.10	1	DRAFT MOTION IN LIMINE.
MARTIN ZW	06/01/23	0.80	1	DRAFT MOTION IN LIMINE.
MARTIN ZW	06/01/23	1.20	1	LEGAL RESEARCH RE: MOTION TO EXCLUDE.
MULLALEY CI	06/01/23	5.30	1	ASSIST WITH PREPARATION FOR EXPERT CROSS.
MULLALEY CI	06/01/23	9.20	1	TRAVEL FROM TRIAL SITE TO BOSTON.
SCHWARTZ JM	06/01/23	6.30	1	DRAFT TRIAL BRIEF.
SCHWARTZ JM	06/01/23	0.40	1	PARTICIPATE ON CALL WITH Z. MARTIN RE: TRIAL BRIEF.
SCHWARTZ JM	06/01/23	0.50	1	PARTICIPATE ON CALL WITH Z. MARTIN AND P. GALLAGHER RE: TRIAL BRIEF.
SCHWARTZ JM	06/01/23	0.30	1	PARTICIPATE ON CALL WITH G. WYATT RE: TRIAL BRIEF.
SILVERSTEIN RA	06/01/23	0.30	1	REVIEW DEPOSITION DESIGNATIONS.
SILVERSTEIN RA	06/01/23	0.60	1	RESEARCH ISSUES RE: DEPOSITION DESIGNATIONS.
SILVERSTEIN RA	06/01/23	0.10	1	EMAIL G. WYATT REGARDING DEPOSITION DESIGNATIONS.
TRANGLE AS	06/01/23	1.80	1	ASSIST WITH PREPARATION OF DEPOSITION DESIGNATIONS.
WYATT GM	06/01/23	6.50	1	ATTEND TRIAL PROCEEDINGS.
WYATT GM	06/01/23	0.90	1	PREPARE FOR TRIAL HEARING.
WYATT GM	06/01/23	0.20	1	COMMUNICATION WITH PLAINTIFF'S COUNSEL RE: DEPOSITION DESIGNATIONS.
WYATT GM	06/01/23	0.80	1	PREPARE FOR ARGUMENT ON MOTION RE: OTHER LAWSUITS.
WYATT GM	06/01/23	1.40	1	REVISE COUNTERS AND OBJECTIONS TO DESIGNATIONS.
BAGGETTA B	06/02/23	2.20	1	REVISE TRIAL BRIEF.
BALZANO AJ	06/02/23	7.20	1	DRAFT EXPERT CROSS EXAMINATION OUTLINE.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BERNARDO RT	06/02/23	0.30	1	CONFER WITH A. BROWN RE WITNESS PREP.
BROWN AM	06/02/23	11.00	1	EDIT OUTLINE FOR UPCOMING CROSS EXAMINATION OF EXPERT.
COGSWELL S	06/02/23	11.00	1	CONTINUE TO DRAFT EXPERT EXAMINATION OUTLINE (10.0); DISCUSS ADDITIONAL EXPERT OUTLINE WITH TRIAL TEAM (1.0).
DAVIDSON J	06/02/23	2.00	1	REVISE TRIAL BRIEF (1.8); AND CONFER WITH J. SCHWARTZ, G. WYATT AND Z. MARTIN RE: SAME (0.2).
DAVIDSON J	06/02/23	0.70	1	REVISE DEPOSITION DESIGNATIONS (0.4) AND CONFER WITH G. WYATT RE: SAME (0.3).
EINSTEIN J *	06/02/23	6.00	1	PREPARE FOR EXPERT CROSS (5.7); PREPARE FOR ADDITIONAL EXPERT CROSS (0.3).
GALLAGHER P	06/02/23	0.20	1	REVIEW REVISIONS TO MOTION TO EXCLUDE.
KARP AM	06/02/23	0.50	1	CALL WITH R. BERNARDO RE: WITNESS PREP.
LEIBOVITZ A	06/02/23	5.80	1	PREPARE KEY DEFENDANTS' EXHIBITS (1.2); MANAGE KEY PLEADINGS (0.8); ASSIST WITH PREPARATION OF OUTLINE FOR CROSS-EXAMINATION OF EXPERT (3.4); ANALYZE KEY PLAINTIFF MEDICAL RECORDS (0.4).
LOFFELMAN KL	06/02/23	4.40	1	REVISE (3.2) AND FINALIZE (1.2) MOTIONS IN LIMINE. .
MARTIN SE	06/02/23	8.70	1	ASSIST WITH PREPARATION FOR EXPERT CROSS.
MARTIN ZW	06/02/23	3.70	1	DRAFT BRIEF RE: MOTION TO EXCLUDE.
SCHWARTZ JM	06/02/23	8.80	1	DRAFT TRIAL BRIEF.
SILVERSTEIN RA	06/02/23	0.70	1	ASSIST WITH PREPARATION OF DEPOSITION DESIGNATIONS.
SILVERSTEIN RA	06/02/23	0.20	1	REVIEW DRAFT MOTION IN LIMINE.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	06/02/23	2.70	1	PREPARE FOR HEARING RE: PENDING MOTIONS.
WYATT GM	06/02/23	3.20	1	ATTEND COURT HEARING.
WYATT GM	06/02/23	0.60	1	REVISE COUNTERS AND OBJECTIONS TO WITNESS TESTIMONY.
BALZANO AJ	06/03/23	7.70	1	DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BROWN AM	06/03/23	12.00	1	EDIT OUTLINE FOR UPCOMING CROSS EXAMINATION OF EXPERT.
COGSWELL S	06/03/23	12.40	1	REVISE EXPERT CROSS (2.6); ASSIST WITH PREPARATION FOR ADDITIONAL EXPERT CROSS (9.8).
LEIBOVITZ A	06/03/23	8.20	1	ASSIST WITH PREPARATION OF EXPERT CROSS EXAMINATION (6.3); REVISE OPERATIVE EXHIBITS (1.9).
BALZANO AJ	06/04/23	11.70	1	DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BROWN AM	06/04/23	12.00	1	PREPARE FOR EXPERT CROSS.
COGSWELL S	06/04/23	14.70	1	REVISE CROSS EXAMINATION OUTLINE OF EXPERT (3.6); REVIEW PRIOR TESTIMONY TO PREPARE FOR CROSS OF ADDITIONAL EXPERT. (11.1).
EINSTEIN J *	06/04/23	6.90	1	PREPARE FOR EXPERT CROSS.
KARP AM	06/04/23	3.10	1	ASSIST WITH PREPARATION FOR CROSS OF PLAINTIFF'S EXPERTS.
KARP AM	06/04/23	2.00	1	ASSIST WITH RESEARCH FOR DIRECTED VERDICT MOTION..
KARP AM	06/04/23	1.00	1	ASSIST WITH PREPARATION FOR EXPERT CROSS.
LEIBOVITZ A	06/04/23	12.20	1	ASSIST WITH PREPARATION OF EXPERT CROSS EXAMINATION (10.4); REVISE OPERATIVE EXHIBITS (1.6); CIRCULATE KEY PLEADINGS (0.2).
LIU W	06/04/23	0.40	1	ASSIST WITH REVIEW OF BACKGROUND OF PLAINTIFF'S TRIAL EXHIBIT.



**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN SE	06/04/23	11.80	1	ASSIST WITH PREPARATION FOR CROSS OF EXPERT (9.5); REVIEW PLAINTIFF'S WITNESS DISCLOSURE DOCUMENTS (1.2); COORDINATION WITH A. LEIBOVITZ RE: EXHIBIT MARKING AND TRACKING (1.1).
MULLALEY CI	06/04/23	8.80	1	DRAFT EXPERT CROSS EXAMINATION SLIDES (4.7), CONFER WITH A. BROWN, A. BALZANO AND C. TEBEAU (CORE) RE: SAME (0.5), ASSIST WITH PREPARATION FOR EXPERT CROSS (3.6).
SILVERSTEIN RA	06/04/23	0.20	1	REVIEW MOTION IN LIMINE.
WYATT GM	06/04/23	0.60	1	ANALYZE DOCUMENTS FOR STIPULATION.
WYATT GM	06/04/23	0.20	1	REVISE OBJECTIONS AND COUNTERS TO WITNESS DESIGNATIONS.
WYATT GM	06/04/23	0.70	1	ANALYZE OBJECTIONS TO PLAINTIFF'S DISCLOSURES.
ALEXANIAN L	06/05/23	0.20	1	ASSIST WITH PREPARATION OF PRODUCED DOCUMENTS FOR ATTORNEY REVIEW IN CONNECTION WITH MOTION FOR DIRECTED VERDICT.
BAGGETTA B	06/05/23	1.20	1	REVISE OPPOSITION TO PLAINTIFF'S TRIAL BRIEF.
BALZANO AJ	06/05/23	1.50	1	RESEARCH IN PREPARATION FOR EXPERT CROSS.
BALZANO AJ	06/05/23	11.50	1	DRAFT EXPERT OUTLINE.
BALZANO AJ	06/05/23	2.50	1	MEET WITH TEAM TO DISCUSS EXPERT CROSS OUTLINE.
BROWN AM	06/05/23	16.50	1	PREPARE FOR (2.7) AND ATTEND (3.8) TRIAL AND PREPARE FOR UPCOMING EXPERT CROSS EXAMINATIONS (10).
CARUSO JA*	06/05/23	10.20	1	ASSIST WITH PREPARATION FOR EXPERT CROSS (4.0); ASSIST WITH PREPARATION FOR WITNESS DIRECT (6.2).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

COGSWELL S	06/05/23	16.40	1	MEETING WITH TRIAL TEAM RE CROSS OUTLINE OF EXPERT. (2.8) PREPARE FOR CROSS EXAMINATION OF EXPERT. (13.6) .
DAVIDSON J	06/05/23	2.50	1	REVIEW PLAINTIFF'S TRIAL BRIEF (0.7); DISCUSS RESPONSE WITH Z. MARTIN AND J. SCHWARTZ (0.4); REVISE TRIAL BRIEF (1.4) .
EINSTEIN J *	06/05/23	8.40	1	PREPARE FOR EXPERT CROSS (7.2); PREPARE FOR ADDITIONAL EXPERT CROSS (1.2) .
KARP AM	06/05/23	2.10	1	REVIEW DOCUMENTS IN CONNECTION WITH DIRECTED VERDICT MOTION.
KARP AM	06/05/23	1.40	1	COMMUNICATE WITH WITNESS AND J. CARUSO REGARDING TRIAL PREPARATION.
LEIBOVITZ A	06/05/23	14.00	1	MAINTAIN OPERATIVE EXHIBIT SET (4.6); ANALYZE PLAINTIFF MEDICAL RECORDS (1.1); CIRCULATE KEY PLEADINGS (0.2); ASSIST WITH PREPARATION OF EXPERT CROSS EXAMINATION (6.9); ATTENTION TO WAR ROOM AND TRIAL SITE LOGISTICS (1.2) .
MARTIN SE	06/05/23	14.20	1	ASSIST WITH PREPARATION FOR CROSS OF EXPERT (11.7); REVIEW PLAINTIFF'S WITNESS DISCLOSURE DOCUMENTS (1.1); COORDINATION WITH A. LEIBOVITZ RE: EXHIBIT MARKING AND TRACKING (1.4) .
MARTIN ZW	06/05/23	4.10	1	DRAFT OPP'N TO PLAINTIFF'S TRIAL BRIEF.
MARTIN ZW	06/05/23	0.30	1	CALL WITH J. DAVISON RE: OPPOSITION TO PLAINTIFF'S TRIAL BRIEF.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MULLALEY CI	06/05/23	13.20	1	ASSIST WITH PREPARATION FOR EXPERT CROSS (12.7); CALL WITH S. RICHMAN RE: DOCUMENT OBJECTIONS (0.2), COMMUNICATE WITH G. WYATT RE: EXPERT DIRECT DOCUMENT OBJECTIONS (0.3).
SCHWARTZ JM	06/05/23	4.80	1	DRAFT RESPONSE TO PLAINTIFF'S TRIAL BRIEF.
SCHWARTZ JM	06/05/23	0.20	1	PARTICIPATE ON CALL WITH A. TRANGLE RE: RESEARCH FOR TRIAL BRIEF.
SCHWARTZ JM	06/05/23	0.20	1	PARTICIPATE ON CALL WITH J. DAVIDSON RE: RESPONSE TO PLAINTIFF'S TRIAL BRIEF.
SILVERSTEIN RA	06/05/23	0.30	1	DISCUSS PLAINTIFF'S TRIAL BRIEF WITH A. TRANGLE.
SILVERSTEIN RA	06/05/23	0.10	1	REVIEW PLAINTIFF'S MOTION IN LIMINE.
TRANGLE AS	06/05/23	2.60	1	RESEARCH (1.4) AND DRAFT ARGUMENT (1.2) IN RESPONSE TO PLAINTIFF'S TRIAL BRIEF.
WYATT GM	06/05/23	3.30	1	ANALYZE OBJECTIONS TO PLAINTIFF'S DISCLOSURES.
WYATT GM	06/05/23	3.80	1	ATTEND HEARING AND TRIAL.
WYATT GM	06/05/23	0.50	1	ANALYZE PLAINTIFF'S MOTION TO EXCLUDE.
WYATT GM	06/05/23	2.00	1	REVISE EXAMINATION OUTLINE FOR EXPERT.
WYATT GM	06/05/23	1.10	1	DRAFT OBJECTIONS TO PLAINTIFF'S EXHIBITS.
WYATT GM	06/05/23	0.30	1	ANALYZE DOCUMENTS FOR STIPULATION.
WYATT GM	06/05/23	0.60	1	REVISE OPPOSITION TO PLAINTIFF'S TRIAL BRIEF.
BALZANO AJ	06/06/23	1.10	1	DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BALZANO AJ	06/06/23	1.20	1	WATCH EXPERT'S CROSS EXAMINATION (1.2) AND IDENTIFY RESPONSIVE DOCUMENTS (1.0).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BALZANO AJ	06/06/23	8.30	1	DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BERNARDO RT	06/06/23	0.30	1	CONFER WITH A. KARP AND J. DAVIDSON RE WITNESS PREPARATION.
BRIER A	06/06/23	0.50	1	ASSIST WITH PREPARATION FOR WITNESS EXAMINATION.
BROWN AM	06/06/23	15.00	1	PREPARE FOR (1.7) AND ATTEND TRIAL (4.3) AND PREPARE FOR UPCOMING CROSS OF EXPERTS (9.0).
BYLER KM	06/06/23	4.10	1	DRAFT MOTION TO EXCLUDE.
CARUSO JA*	06/06/23	11.60	1	ASSIST WITH PREPARATION FOR EXPERT CROSS.
COGSWELL S	06/06/23	12.30	1	PREPARE FOR CROSS EXAMINATION OF EXPERT (5.3); PREPARE MATERIAL FOR UPCOMING ARGUMENT (1.0); REVISE CROSS-EXAMINATION OUTLINE OF ADDITIONAL EXPERT (6.0).
DAVIDSON J	06/06/23	2.00	1	REVISE TRIAL BRIEFS.
EINSTEIN J *	06/06/23	9.90	1	PREPARE FOR EXPERT CROSS.
GALLAGHER P	06/06/23	0.10	1	CONFER WITH Z. MARTIN AND J. DAVIDSON REGARDING DIRECTED VERDICT MOTION.
KARP AM	06/06/23	0.20	1	REVIEW PLAINTIFFS' EXPERT MATERIALS IN CONNECTION WITH CROSS-EXAMINATION.
KARP AM	06/06/23	4.10	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT (3.5); CONFER WITH J. DAVIDSON, S. MARTIN, AND A. BRIER RE: SAME (0.6).
LEIBOVITZ A	06/06/23	14.30	1	MAINTAIN OPERATIVE EXHIBIT SET (4.8); ASSIST WITH PREPARATION OF EXPERT CROSS EXAMINATION (2.1); ASSIST WITH PREPARATION OF ADDITIONAL EXPERT CROSS EXAMINATION (7.2); CIRCULATE KEY PLEADINGS (0.2).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN SE	06/06/23	15.10	1	REVISE TRIAL EXHIBIT LIST (1.8); PREPARE FOR CROSS EXAMINATION OF EXPERT (7.1); ASSIST WITH CROSS EXAMINATION OF EXPERT (2.1); ASSIST WITH PREPARATION FOR CROSS EXAMINATION OF ADDITIONAL EXPERT (1.2); ASSIST WITH RESPONSES TO QUESTIONS FROM THE COURT AND CLERK (0.8); ASSIST WITH PREPARATION FOR COMPANY WITNESS TESTIMONY (2.1).
MARTIN ZW	06/06/23	7.10	1	RESEARCH OPP'N TO MOT. TO EXCLUDE (2.1), CALL WITH J. SCHWARTZ RE: SAME (0.2), DRAFT OPP'N TO MOTION TO EXCLUDE (4.8).
MARTIN ZW	06/06/23	0.10	1	DRAFT MOT. FOR DIRECTED VERDICT.
MARTIN ZW	06/06/23	2.20	1	DRAFT MOTION TO EXCLUDE.
MULLALEY CI	06/06/23	13.80	1	ASSIST TRIAL COUNSEL WITH PREPARATION FOR CROSS OF EXPERTS (12.6), REVISE CROSS OUTLINE OF EXPERT (0.8), COMMUNICATE WITH A. BALZANO RE: EXPERT CROSS (0.4).
SCHWARTZ JM	06/06/23	0.30	1	REVISE OPPOSITION TO PLAINTIFF'S TRIAL BRIEF.
SCHWARTZ JM	06/06/23	0.50	1	PARTICIPATE ON CALL WITH Z. MARTIN RE: OPPOSITION TO PLAINTIFF'S MOTION TO EXCLUDE.
SCHWARTZ JM	06/06/23	0.30	1	PARTICIPATE ON CALL WITH J. DAVIDSON AND G. WYATT RE: OPPOSITION TO PLAINTIFF'S MOTION TO EXCLUDE.
SCHWARTZ JM	06/06/23	2.50	1	DRAFT OPPOSITION TO PLAINTIFF'S MOTION TO EXCLUDE.
SILVERSTEIN RA	06/06/23	2.80	1	REVIEW EXPERT DEPOSITIONS FOR TRIAL BRIEF.
SILVERSTEIN RA	06/06/23	3.50	1	RESEARCH CASE LAW (2.2) AND DEPOSITION TESTIMONY (1.3) FOR TRIAL BRIEF.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

TRANGLE AS	06/06/23	2.70	1	RESEARCH ARGUMENT IN RESPONSE TO PLAINTIFF'S TRIAL BRIEF.
WYATT GM	06/06/23	0.20	1	REVISE MOTION TO PRECLUDE EVIDENCE.
WYATT GM	06/06/23	0.40	1	MEET AND CONFER WITH PLAINTIFF'S COUNSEL RE: EXHIBIT OBJECTIONS.
WYATT GM	06/06/23	3.30	1	ANALYZE OBJECTIONS TO PLAINTIFF'S DISCLOSURES.
WYATT GM	06/06/23	0.60	1	PREPARE FOR HEARING ON OBJECTIONS TO EXHIBITS.
WYATT GM	06/06/23	2.00	1	PREPARE FOR HEARING ON GENETICS MOTIONS.
WYATT GM	06/06/23	2.00	1	REVISE RESPONSE TO PLAINTIFF'S TRIAL BRIEF.
WYATT GM	06/06/23	0.50	1	REVISE RESPONSE TO PLAINTIFF'S TRIAL BRIEF.
WYATT GM	06/06/23	0.20	1	COMMUNICATION WITH J. DAVIDSON RE: DIRECTED VERDICT MOTION.
BAGGETTA B	06/07/23	1.20	1	REVISE OPPOSITION TO PLAINTIFF'S TRIAL BRIEF.
BALZANO AJ	06/07/23	14.70	1	DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BRIER A	06/07/23	1.20	1	ASSIST WITH PREPARATION FOR WITNESS EXAMINATION.
BROWN AM	06/07/23	16.50	1	PREPARE FOR (2.6) AND ATTEND TRIAL (4.9) AND PREPARE FOR CROSS EXAMINATION OF EXPERT (9.5).
CARUSO JA*	06/07/23	18.70	1	ASSIST WITH PREPARATION FOR EXPERT CROSS (5.6); ASSIST WITH PREPARATION FOR EXPERT CROSS (13.1).
CATHERS W	06/07/23	7.50	1	ASSIST WITH PREPARATION OF EXPERT CROSS OUTLINE.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

COGSWELL S	06/07/23	15.40	1	PREPARE FOR CROSS EXAMINATION OF EXPERT. (9.9) PREPARE FOR CROSS EXAMINATION OF ADDITIONAL EXPERT. (4) MEET WITH TRIAL TO DISCUSS UPCOMING CROSS EXAMINATIONS (1.5).
DAVIDSON J	06/07/23	0.70	1	CONFER WITH Z. MARTIN RE DIRECTED VERDICT MOTION.
DAVIDSON J	06/07/23	1.20	1	CONFER WITH J. SCHWARTZ, G. WYATT RE TRIAL BRIEF AND REVISE BRIEF.
EINSTEIN J *	06/07/23	12.90	1	PREPARE FOR EXPERT CROSS.
GALLAGHER P	06/07/23	0.60	1	ASSIST WITH STRATEGY RE: DIRECTED VERDICT MOTION.
GALLAGHER P	06/07/23	0.60	1	CONFER WITH Z. MARTIN AND R. SILVERSTEIN REGARDING DIRECTED VERDICT MOTION.
GALLAGHER P	06/07/23	2.70	1	ASSIST WITH RESEARCH RE: VERDICT FORM.
KARP AM	06/07/23	3.10	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
LEIBOVITZ A	06/07/23	19.00	1	MAINTAIN OPERATIVE EXHIBIT SET (5.0); ASSIST WITH PREPARATION OF TREATER CROSS EXAMINATION (8.4); ASSIST WITH PREPARATION OF EXPERT CROSS EXAMINATION (4.3); ORGANIZE PLAINTIFF MEDICAL RECORDS (1.0); CIRCULATE KEY PLEADINGS (0.3).
LIU W	06/07/23	0.70	1	ASSIST WITH REVIEW OF BACKGROUND OF PLAINTIFF'S TRIAL EXHIBIT.
LOFFELMAN KL	06/07/23	4.40	1	REVISE (3.2) AND FINALIZE (1.2) MOTIONS IN LIMINE.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN SE	06/07/23	18.20	1	COORDINATE WITH A. LEIBOVITZ ON ADMITTED EVIDENCE (1.4); REVISE TRIAL EXHIBITS (0.5); ASSIST WITH PREPARATION FOR CROSS OF EXPERT (14.3); COORDINATION WITH TEAM RE: ADDRESSING REQUESTS FROM COURT (0.8); ASSIST WITH PREPARATION FOR CROSS OF ANOTHER EXPERT (1.2).
MARTIN ZW	06/07/23	3.60	1	DRAFT DIRECTED VERDICT OUTLINE (3.0), CALL WITH J. DAVIDSON, P. GALLAGHER & R. SILVERSTEIN RE: SAME (.6).
MARTIN ZW	06/07/23	5.20	1	REVISE OPP'N TO MOTION TO EXCLUDE.
MULLALEY CI	06/07/23	18.60	1	PREPARE FOR EXPERT CROSS.
SCHWARTZ JM	06/07/23	3.30	1	REVISE OPPOSITION TO PLAINTIFF'S MOTION IN LIMINE.
SILVERSTEIN RA	06/07/23	1.10	1	REVIEW TRIAL TESTIMONY FOR DIRECTED VERDICT MOTION.
SILVERSTEIN RA	06/07/23	0.20	1	REVIEW DEFENDANT'S MEMO IN OPPOSITION TO PLAINTIFF'S MOTION IN LIMINE.
SILVERSTEIN RA	06/07/23	0.50	1	REVIEW CASE LAW FOR DIRECTED VERDICT MOTION.
SILVERSTEIN RA	06/07/23	0.60	1	SPEAK WITH Z. MARTIN AND P. GALLAGHER CONCERNING TRIAL BRIEF.
WYATT GM	06/07/23	0.40	1	ANALYZE PLAINTIFF'S DESIGNATIONS OF WITNESS TESTIMONY.
WYATT GM	06/07/23	0.60	1	ATTEND TRIAL PROCEEDINGS.
WYATT GM	06/07/23	0.40	1	COMMUNICATION WITH PLAINTIFF'S COUNSEL RE: DESIGNATIONS.
WYATT GM	06/07/23	2.00	1	DRAFT OBJECTIONS TO REVISED CLIP DESIGNATIONS.
WYATT GM	06/07/23	1.70	1	REVISE OPPOSITION TO MOTION TO EXCLUDE.
WYATT GM	06/07/23	4.60	1	REVISE EXAMINATION OUTLINE OF EXPERT.



**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BALZANO AJ	06/08/23	3.70	1	ATTEND EXPERT DIRECT AND CROSS EXAMINATION.
BALZANO AJ	06/08/23	3.90	1	HELP DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BRIER A	06/08/23	0.90	1	ASSIST WITH PREPARATION FOR WITNESS EXAMINATION.
BROWN AM	06/08/23	12.00	1	PREPARE FOR (2.1) AND ATTEND TRIAL (4.9) AND PREPARE FOR UPCOMING CROSS EXAMINATION OF EXPERT (5).
CARUSO JA*	06/08/23	11.30	1	PREPARE FOR EXPERTS CROSS EXAMINATION.
CATHERS W	06/08/23	13.50	1	ASSIST WITH PREPARATION OF EXPERT CROSS OUTLINE.
COGSWELL S	06/08/23	9.80	1	PREPARE FOR CROSS EXAMINATION OF EXPERT.
COX CD	06/08/23	0.40	1	CONFER WITH G. WYATT AND J. SCHWARTZ RE: PLAINTIFF'S WITNESS DEPOSITION DESIGNATIONS.
EINSTEIN J *	06/08/23	9.10	1	ASSIST WITH PREPARATION FOR EXPERT CROSS.
FLEET I	06/08/23	1.90	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
GALLAGHER P	06/08/23	1.60	1	DRAFT DIRECTED VERDICT MOTION.
GALLAGHER P	06/08/23	4.30	1	RESEARCH IN CONNECTION WITH DIRECTED VERDICT MOTION (4.0); PHONE CALL WITH Z. MARTIN AND A. TRANGLE REGARDING THE SAME (0.3).
GALLAGHER P	06/08/23	1.90	1	REVIEW TRIAL TRANSCRIPTS IN SUPPORT OF DIRECTED VERDICT MOTION.
KARP AM	06/08/23	1.00	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
KARP AM	06/08/23	1.40	1	CONFER WITH A. BROWN, C. KOURY AND W. LIU REGARDING PROOF OF PRODUCTION OF DOCUMENTS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

LEIBOVITZ A	06/08/23	8.00	1	MAINTAIN OPERATIVE EXHIBIT SET (4.8); ASSIST WITH PREPARATION OF EXPERT CROSS EXAMINATION (1.6); ASSIST WITH PREPARATION OF ANOTHER EXPERT CROSS EXAMINATION (1.4); CIRCULATE KEY PLEADINGS (0.2).
LIU W	06/08/23	0.30	1	ASSIST WITH REVIEW OF BACKGROUND OF PLAINTIFF'S TRIAL EXHIBIT.
MARTIN SE	06/08/23	9.70	1	ATTEND COURT FOR EXPERT CROSS (3.4); PREPARE FOR EXPERT CROSS (6.3).
MARTIN ZW	06/08/23	7.00	1	LEGAL RESEARCH FOR DIRECTED VERDICT MOTION (2.0), CONFER WITH J. DAVIDSON AND G. WYATT RE: SAME (0.6), DRAFT DIRECTED VERDICT MOTION (4.4).
MULLALEY CI	06/08/23	11.00	1	PREPARE FOR EXPERT CROSS.
SCHWARTZ JM	06/08/23	2.40	1	DRAFT OUTLINE OF MOTION TO EXCLUDE.
SCHWARTZ JM	06/08/23	0.40	1	PARTICIPATE ON CALL WITH R. SILVERSTEIN ASSIGNING MOTION TO EXCLUDE.
SCHWARTZ JM	06/08/23	0.30	1	PARTICIPATE ON CALL WITH R. SILVERSTEIN RE: MOTION TO EXCLUDE.
SILVERSTEIN RA	06/08/23	0.40	1	REVIEW TRIAL TESTIMONY RECORD FOR DIRECTED VERDICT MOTION.
SILVERSTEIN RA	06/08/23	3.00	1	DRAFT MOTION TO EXCLUDE DESIGNATIONS.
SILVERSTEIN RA	06/08/23	2.50	1	REVIEW RECORD FOR VARIOUS CITATIONS FOR MOTION TO EXCLUDE DESIGNATIONS.
SILVERSTEIN RA	06/08/23	3.50	1	RESEARCH CASE LAW FOR MOTION TO EXCLUDE DESIGNATIONS.
SILVERSTEIN RA	06/08/23	0.40	1	CALL WITH J. SCHWARTZ REGARDING MATERIALS FOR TRIAL BRIEF.
SILVERSTEIN RA	06/08/23	2.30	1	RESEARCH CASE LAW FOR TRIAL BRIEF.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

ST. AMAND A	06/08/23	0.60	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
TRANGLE AS	06/08/23	5.80	1	REVIEW TRIAL TESTIMONY IN CONNECTION WITH DIRECTED VERDICT MOTION..
TRANGLE AS	06/08/23	0.30	1	DISCUSSION WITH Z. MARTIN AND P. GALLAGHER RE: DIRECTED VERDICT MOTION.
WYATT GM	06/08/23	0.80	1	ATTEND TRIAL PROCEEDINGS.
WYATT GM	06/08/23	6.60	1	DRAFT OBJECTIONS AND COUNTER-DESIGNATIONS RE: DEPONENTS.
WYATT GM	06/08/23	0.30	1	PREPARE FOR GENETICS ARGUMENT.
BALZANO AJ	06/09/23	4.80	1	HELP DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BALZANO AJ	06/09/23	5.10	1	DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BRADY PE	06/09/23	1.00	1	CONDUCT RESEARCH IN SUPPORT OF SUPPLEMENTAL MIL.
BROWN AM	06/09/23	3.00	1	PREPARE FOR (0.6) AND PARTICIPATE IN (2.4) HEARING ON MOTIONS.
CARUSO JA*	06/09/23	13.20	1	PREPARE FOR EXPERTS' CROSS-EXAMINATION.
COGSWELL S	06/09/23	6.00	1	REVIEW UPDATED MEDICAL RECORDS. (1.7) REVISE CROSS EXAMINATION OF EXPERT. (4.3).
DAVIDSON J	06/09/23	0.20	1	CONFER WITH J. SCHWARTZ RE TRIAL BRIEFS.
EINSTEIN J *	06/09/23	6.40	1	ASSIST WITH PREPARATION FOR EXPERT CROSS.
GALLAGHER P	06/09/23	2.20	1	RESEARCH IN CONNECTION WITH DIRECTED VERDICT MOTION (1.9); PHONE CALL WITH A. TRANGLE REGARDING THE SAME (0.3).
GALLAGHER P	06/09/23	1.60	1	PREPARE DIRECTED VERDICT MOTION.
KARP AM	06/09/23	0.40	1	REVIEW DOCUMENTS IN CONNECTION WITH CROSS-EXAMINATION OF EXPERT.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

KARP AM	06/09/23	6.10	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
LEIBOVITZ A	06/09/23	9.40	1	MAINTAIN OPERATIVE EXHIBIT SET (1.7); ASSIST WITH PREPARATION OF EXPERT CROSS EXAMINATION (5.9); ANALYZE PLAINTIFF MEDICAL RECORDS (1.8).
LOGAN MA	06/09/23	0.50	1	IMPORT DATA INTO TEXTMAP.
MARTIN SE	06/09/23	11.20	1	ASSIST WITH PREPARATION FOR CROSS OF EXPERT (7.0); ATTENTION TO TRIAL LOGISTICS (1.2); COORDINATION RE: TRACKING OF EXHIBITS (3.0).
MARTIN ZW	06/09/23	7.10	1	LEGAL RESEARCH FOR DIRECTED VERDICT (3.0), DRAFT DIRECTED VERDICT MOTION (4.1).
MULLALEY CI	06/09/23	8.60	1	PREPARE FOR EXPERT CROSS.
SCHWARTZ JM	06/09/23	0.10	1	PARTICIPATE ON CALL WITH G. WYATT RE: MOTION TO EXCLUDE.
SCHWARTZ JM	06/09/23	0.30	1	PARTICIPATE ON CALL WITH R. SILVERSTEIN RE: MOTION TO EXCLUDE.
SILVERSTEIN RA	06/09/23	3.90	1	RESEARCH CASE LAW (2.1) AND RECORD (1.8) FOR TRIAL BRIEF.
SILVERSTEIN RA	06/09/23	3.30	1	DRAFT TRIAL BRIEF.
TRANGLE AS	06/09/23	5.10	1	ANALYZE TRIAL TESTIMONY FOR DIRECTED VERDICT MOTION.
WYATT GM	06/09/23	2.10	1	DRAFT OBJECTIONS AND COUNTER-DESIGNATIONS RE: DEPONENTS.
WYATT GM	06/09/23	1.90	1	PREPARE FOR HEARING ON MOTIONS.
WYATT GM	06/09/23	2.40	1	ATTEND HEARING ON GENETICS MOTIONS.
BALZANO AJ	06/10/23	9.20	1	DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BROWN AM	06/10/23	4.50	1	PREPARE FOR UPCOMING CROSS EXAMINATION OF EXPERT.
CARUSO JA*	06/10/23	11.70	1	PREPARE FOR EXPERT'S CROSS-EXAMINATION.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

COGSWELL S	06/10/23	4.00	1	REVIEW MEDICAL RECORDS. (1.5); REVIEW TRIAL TRANSCRIPTS TO PREPARE FOR CLOSING ARGUMENTS. (2.5).
DAVIDSON J	06/10/23	0.10	1	CONFER WITH A. KARP RE WITNESS TRIAL PREPARATION.
DAVIDSON J	06/10/23	0.70	1	REVISE TRIAL BRIEF.
KARP AM	06/10/23	2.70	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT (2.1); CONFER WITH R. BERNARDO, J. DAVIDSON AND A. BROWN RE: SAME (0.6).
MARTIN SE	06/10/23	8.20	1	ASSIST WITH PREPARATION FOR CROSS OF EXPERT (6.0); REVISE EXHIBIT TRACKER (2.2).
MULLALEY CI	06/10/23	11.40	1	PREPARE FOR EXPERT CROSS.
SCHWARTZ JM	06/10/23	5.20	1	EDIT DRAFT MOTION TO EXCLUDE.
SILVERSTEIN RA	06/10/23	1.10	1	REVISE TRIAL BRIEF.
TRANGLE AS	06/10/23	0.40	1	ANALYZE TRIAL TESTIMONY FOR DIRECTED VERDICT MOTION.
WYATT GM	06/10/23	2.10	1	ANALYZE EXPERT EXHIBITS FOR OBJECTIONS.
ANDERSON C	06/11/23	0.40	1	ARTICLE RETRIEVAL.
BALZANO AJ	06/11/23	15.00	1	ASSIST WITH PREPARATION OF EXPERT CROSS EXAMINATION OUTLINE.
BRADY PE	06/11/23	3.70	1	REVIEW DOCUMENT PRODUCTIONS.
BRIER A	06/11/23	1.00	1	ASSIST WITH PREPARATION FOR WITNESS EXAMINATION.
BROWN AM	06/11/23	17.00	1	EDIT OUTLINE FOR UPCOMING CROSS EXAMINATION OF EXPERT (15.5) AND PREPARE FOR THE SAME (1.5) ..
CARUSO JA*	06/11/23	15.20	1	PREPARE FOR EXPERT'S CROSS- EXAMINATION.
COGSWELL S	06/11/23	9.90	1	PREPARE FOR EXPERT CROSS EXAMINATION.
COGSWELL S	06/11/23	2.00	1	MEET WITH TRIAL TEAM.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

DAVIDSON J	06/11/23	1.30	1	REVISE TRIAL BRIEF (1.1); AND RELATED COMMUNICATION WITH Z. MARTIN AND G. WYATT (0.2).
EINSTEIN J *	06/11/23	10.00	1	PREPARE FOR EXPERT CROSS.
GALLAGHER P	06/11/23	2.90	1	PREPARE TRIAL MOTION.
GALLAGHER P	06/11/23	0.40	1	RESEARCH IN CONNECTION WITH TRIAL MOTION.
KARP AM	06/11/23	1.90	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT (1.5); EMAILS WITH R. BERNARDO, J. DAVIDSON, C. MULLALEY AND A. LEIBOVITZ RE: SAME (0.4).
LEIBOVITZ A	06/11/23	12.60	1	ASSIST WITH PREPARATION OF EXPERT CROSS EXAMINATION (8.2); CIRCULATE AND MANAGE KEY PLEADINGS (0.2); ASSIST WITH PREPARATION OF EXPERT CROSS EXAMINATION (3.9); ASSIST WITH PREPARATION OF WITNESS DIRECT EXAMINATION (0.3).
MARTIN SE	06/11/23	15.00	1	ASSIST WITH PREPARATION FOR CROSS EXAMINATION OF EXPERT.
MARTIN ZW	06/11/23	2.50	1	DRAFT TRIAL MOTION (1.5), REVISE MOTION IN LIMINE (1.0).
MCCARTHY SR	06/11/23	2.90	1	RESEARCH CASE LAW RE CAUSATION.
MULLALEY CI	06/11/23	14.10	1	PREPARE FOR EXPERT CROSS.
SCHWARTZ JM	06/11/23	3.50	1	REVISE MOTION TO EXCLUDE.
SILVERSTEIN RA	06/11/23	0.40	1	REVIEW TRIAL BRIEF REVISIONS.
SILVERSTEIN RA	06/11/23	2.20	1	RESEARCH CASE LAW FOR TRIAL BRIEF.
SILVERSTEIN RA	06/11/23	0.10	1	REVIEW COMMENTS FROM G. WYATT REGARDING TRIAL BRIEF.
TRANGLE AS	06/11/23	1.50	1	ANALYZE TRIAL TESTIMONY FOR TRIAL MOTION.
WYATT GM	06/11/23	1.40	1	COMMUNICATION WITH PL.'S COUNSEL RE: OBJECTIONS TO EXPERT EXHIBITS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	06/11/23	0.70	1	DRAFT PROPOSED STIPULATION RE: COMPANY DOCUMENTS.
WYATT GM	06/11/23	0.40	1	PREPARE FOR HEARING ON OBJECTION TO EXHIBITS.
WYATT GM	06/11/23	1.00	1	PREPARE FOR HEARING ON MOTION TO EXCLUDE.
WYATT GM	06/11/23	0.20	1	REVISE MOTION TO EXCLUDE.
WYATT GM	06/11/23	0.60	1	REVISE OUTLINE OF EXPERT EXAMINATION.
WYATT GM	06/11/23	0.50	1	REVISE OBJECTIONS AND COUNTER DESIGNATIONS RE: WITNESS.
WYATT GM	06/11/23	0.30	1	REVISE OBJECTIONS AND COUNTER DESIGNATIONS RE: COMPANY WITNESS.
WYATT GM	06/11/23	1.10	1	ANALYZE RECORD RE: OBJECTIONS.
WYATT GM	06/11/23	1.00	1	ANALYZE EXPERT PRESENTATION FOR OBJECTIONS.
WYATT GM	06/11/23	0.40	1	REVISE MOTION TO EXCLUDE.
WYATT GM	06/11/23	1.60	1	REVISE MOTION IN LIMINE.
WYATT GM	06/11/23	0.30	1	ANALYZE PLAINTIFF'S OPPOSITION TO MOTION TO EXCLUDE.
WYATT GM	06/11/23	1.10	1	REVISE CROSS OUTLINE FOR EXPERT.
BAGGETTA B	06/12/23	1.10	1	REVISE TRIAL BRIEF.
BALZANO AJ	06/12/23	5.10	1	ATTEND COURT PROCEEDING FOR THE EXPERT CROSS AND EXPERT DIRECT.
BALZANO AJ	06/12/23	12.00	1	DRAFT EXPERT CROSS EXAMINATION OUTLINE.
BRADY PE	06/12/23	0.30	1	REVIEW DOCUMENT PRODUCTIONS.
BRIER A	06/12/23	0.20	1	ASSIST WITH PREPARATION FOR WITNESS EXAMINATION.
BROWN AM	06/12/23	16.50	1	PREPARE FOR (2.9) AND ATTEND TRIAL (5.1) AND EDIT OUTLINE FOR CROSS EXAMINATION OF EXPERT (8.5).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

CARUSO JA*	06/12/23	16.10	1	PREPARE FOR EXPERT'S CROSS-EXAMINATION.
COGSWELL S	06/12/23	8.10	1	ASSIST WITH PREPARATION FOR CLOSING.
COGSWELL S	06/12/23	5.50	1	ASSIST WITH PREPARATION FOR CLOSING.
DAVIDSON J	06/12/23	1.20	1	CALLS AND EMAILS WITH G. WYATT RE TRIAL BRIEF (0.8); AND REVISE MOTION TO EXCLUDE BRIEF (0.4).
EINSTEIN J *	06/12/23	12.70	1	ASSIST WITH PREPARATION FOR EXPERT CROSS.
FLEET I	06/12/23	1.20	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
GALLAGHER P	06/12/23	1.70	1	RESEARCH IN CONNECTION WITH TRIAL MOTION.
GALLAGHER P	06/12/23	2.80	1	REVISE TRIAL MOTION (2.0); CORRESPONDENCE WITH Z. MARTIN AND A. TRANGLE REGARDING THE SAME (0.8).
HO U	06/12/23	0.30	1	ASSIST WITH RESEARCH RE: RULES RE PAGE/WORD LIMITATIONS FOR POST-TRIAL HEARING BRIEFS.
KARP AM	06/12/23	8.70	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
LEIBOVITZ A	06/12/23	16.20	1	MAINTAIN OPERATIVE EXHIBIT SET (5.2); CIRCULATE KEY PLEADINGS (0.2); ASSIST WITH PREPARATION OF EXPERT CROSS EXAMINATION (9.7); ANALYZE KEY PLAINTIFF DOCUMENTS (1.1).
LIU W	06/12/23	2.10	1	ASSIST WITH REVIEW OF BACKGROUND OF PLAINTIFF'S TRIAL EXHIBIT.
MARTIN SE	06/12/23	16.50	1	ASSIST WITH PREPARATION FOR CROSS EXAMINATION OF EXPERT.
MARTIN ZW	06/12/23	8.20	1	DRAFT TRIAL BRIEF.
MCCARTHY SR	06/12/23	1.70	1	ASSIST WITH PREPARATION OF MOTION FOR DIRECTED VERDICT.
MULLALEY CI	06/12/23	14.80	1	PREPARE FOR EXPERT CROSS.



**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

SCHWARTZ JM	06/12/23	7.20	1	REVISE MOTION TO EXCLUDE.
SILVERSTEIN RA	06/12/23	0.80	1	REVIEW TRIAL TRANSCRIPTS FOR TRIAL BRIEF.
SILVERSTEIN RA	06/12/23	0.40	1	REVIEW CHANGES TO TRIAL BRIEF.
SILVERSTEIN RA	06/12/23	0.70	1	ASSIST IN REVISIONS TO TRIAL BRIEF.
SILVERSTEIN RA	06/12/23	0.30	1	REVIEW TALC MATERIALS IN CONNECTION WITH TRIAL BRIEF.
TRANGLE AS	06/12/23	3.30	1	ANALYZE EVIDENCE AND TRIAL TESTIMONY FOR DIRECTED VERDICT MOTION.
WYATT GM	06/12/23	0.50	1	PREPARE FOR HEARING AND TRIAL.
WYATT GM	06/12/23	0.60	1	MEET AND CONFER WITH PLAINTIFF'S COUNSEL RE: OBJECTIONS.
WYATT GM	06/12/23	2.80	1	ATTEND TRIAL PROCEEDINGS.
WYATT GM	06/12/23	1.50	1	DRAFT OFFER OF PROOF .
WYATT GM	06/12/23	0.30	1	COMMUNICATION WITH S. RICHMAN AND B. KING RE: JUDGE RULINGS.
WYATT GM	06/12/23	5.80	1	PREPARE FOR ARGUMENT ON EXPERT.
WYATT GM	06/12/23	1.00	1	RESEARCH TRIAL MOTION ARGUMENT.
WYATT GM	06/12/23	0.30	1	REVIEW EXAMINATION OUTLINE FOR EXPERT.
WYATT GM	06/12/23	0.30	1	COMMUNICATION WITH A. BROWN RE: TRIAL STRATEGY.
WYATT GM	06/12/23	1.90	1	REVISE TRIAL BRIEF.
BAGGETTA B	06/13/23	1.40	1	REVISE AND FINALIZE TRIAL BRIEF.
BAGGETTA B	06/13/23	1.20	1	REVISE AND FINALIZE OPPOSITION TO PLAINTIFF'S TRIAL BRIEF.
BALZANO AJ	06/13/23	10.70	1	EDIT EXPERT CROSS EXAMINATION OUTLINE.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BALZANO AJ	06/13/23	5.10	1	EDIT EXPERT CROSS EXAMINATION OUTLINE.
BRIER A	06/13/23	1.00	1	PREPARE EXHIBITS TO TRIAL BRIEF.
BRIER A	06/13/23	5.00	1	REVISE TRIAL BRIEF.
BROWN AM	06/13/23	16.80	1	PREPARE FOR (2.8) AND ATTEND TRIAL (5.2) AND PREPARE FOR CONTINUED CROSS EXAMINATION OF EXPERT (8.8).
CARUSO JA*	06/13/23	16.90	1	PREPARE FOR EXPERT'S CROSS-EXAMINATION (14.2). PREPARE FOR WITNESS'S DIRECT EXAMINATION (2.7).
COGSWELL S	06/13/23	7.10	1	PREPARE FOR WITNESS DIRECT EXAMINATION. (.7) PREPARE FOR CLOSING ARGUMENTS. (2.8) PREPARE FOR CROSS EXAMINATION OF EXPERTS. (3.6).
COGSWELL S	06/13/23	1.00	1	MEET WITH TRIAL TEAM RE: CLOSING.
COGSWELL S	06/13/23	5.90	1	ASSIST WITH PREPARATION FOR CLOSING. (4.9) PREPARE FOR EXPERT CROSS-EXAMINATION. (1).
COGSWELL S	06/13/23	1.60	1	PREPARE FOR EXPERT CROSS-EXAMINATION (.5). REVIEW NEW MEDICAL RECORDS (.9). PREPARE FOR WITNESS DIRECT EXAMINATION (.2).
DAVIDSON J	06/13/23	2.00	1	REVIEW PLAINTIFF'S MOTION FOR SANCTIONS (1.2); PREPARE FOR WITNESS EXAMINATION (0.8).
EINSTEIN J *	06/13/23	10.30	1	ATTENTION TO TRIAL PROCEEDINGS TO PROVIDE SUPPORT FOR CROSS EXAMINATION OF EXPERT (4.2); ASSIST WITH PREPARATION OF CONTINUED EXPERT CROSS (6.1).
KARP AM	06/13/23	8.60	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

LEIBOVITZ A	06/13/23	16.60	1	MAINTAIN OPERATIVE EXHIBIT SET (5.0); ASSIST WITH PREPARATION OF EXPERT CROSS EXAMINATIONS (11.1); CIRCULATE KEY PLEADINGS (0.3); ASSIST WITH PREPARATION OF WITNESS DIRECT EXAMINATION (0.2).
MAHADEVAN V	06/13/23	2.40	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
MAHADEVAN V	06/13/23	0.50	1	ASSIST WITH PREPARATION FOR CLOSING.
MARTIN SE	06/13/23	15.50	1	ATTEND AND PROVIDE SUPPORT FOR CROSS OF EXPERT (5.0); PREPARE FOR CONTINUED CROSS EXAMINATION OF EXPERT (7.2); ASSIST WITH PREPARATION OF RESPONSE TO TRIAL BRIEF (2.1); MAINTAIN TRIAL EXHIBITS (1.2).
MARTIN ZW	06/13/23	3.30	1	LEGAL RESEARCH RE: DIRECTED VERDICT BRIEFS (2.3), LEGAL RESEARCH RE: SANCTIONS (1.0).
MULLALEY CI	06/13/23	14.60	1	PREPARE FOR EXPERT CROSS.
SILVERSTEIN RA	06/13/23	0.30	1	REVIEW TRIAL TESTIMONY FOR DIRECTED VERDICT MOTION.
SILVERSTEIN RA	06/13/23	0.60	1	FIND DOCUMENTS RELEVANT FOR TRIAL BRIEF.
SILVERSTEIN RA	06/13/23	0.50	1	REVIEW TRIAL TESTIMONY FOR TRIAL BRIEF.
TRANGLE AS	06/13/23	3.20	1	ANALYZE TRIAL TESTIMONY FOR DIRECTED VERDICT MOTION.
WYATT GM	06/13/23	5.80	1	REVISE EXPERT EXAMINATION OUTLINE.
WYATT GM	06/13/23	1.20	1	ATTEND TRIAL PROCEEDINGS.
WYATT GM	06/13/23	1.70	1	PREPARE FOR HEARING ON EXPERT MOTION.
WYATT GM	06/13/23	0.70	1	RESEARCH PRIOR EVIDENTIARY RULINGS.
WYATT GM	06/13/23	1.90	1	REVISE SUBMISSIONS RE: WITNESSES.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	06/13/23	1.40	1	ANALYZE EXPERT PRESENTATION FOR OBJECTIONS.
WYATT GM	06/13/23	1.80	1	DRAFT OUTLINE OF OPPOSITION TO MOTION FOR SANCTIONS.
ALEXANIAN L	06/14/23	3.10	1	EDIT/REVISE ANALYSIS TALC DOCUMENTS (2.8); COMMUNICATE WITH C. COX RE: SAME (0.3).
BALZANO AJ	06/14/23	3.90	1	REVISE EXPERT CROSS EXAMINATION OUTLINE.
BALZANO AJ	06/14/23	6.10	1	ATTEND COURT FOR EXPERT TESTIMONY.
BRIER A	06/14/23	10.70	1	ASSIST WITH WITNESS EXAMINATION PREP.
BROWN AM	06/14/23	16.50	1	PREPARE FOR (1.9) AND ATTEND COURT (6.1) AND PREPARE FOR CONTINUED CROSS EXAMINATION OF EXPERT (4.0) AND CROSS OF ANOTHER EXPERT (4.5).
CARUSO JA*	06/14/23	15.10	1	PREPARE FOR EXPERT'S CROSS-EXAMINATION (3.1). PREPARE FOR ANOTHER EXPERT'S CROSS-EXAMINATION (5.2). CONDUCT RESEARCH RELATED TO MOTION PRACTICE (6.8).
COGSWELL S	06/14/23	4.90	1	PREPARE FOR CROSS EXAMINATION OF EXPERT.
COGSWELL S	06/14/23	4.50	1	REVIEW MEDICAL RECORDS IN CONNECTION WITH UPCOMING ARGUMENT.
COGSWELL S	06/14/23	0.60	1	PREPARE FOR DIRECT EXAMINATION OF WITNESS.
COGSWELL S	06/14/23	0.30	1	PREPARE FOR CROSS EXAMINATION OF EXPERT.
COGSWELL S	06/14/23	3.40	1	ASSIST WITH PREPARATION FOR CLOSING ARGUMENTS. (1.9) REVIEW MEDICAL RECORDS IN CONNECTION WITH UPCOMING CROSS EXAMINATIONS. (1.5).
COX CD	06/14/23	0.40	1	CONFER WITH A. KARP RE: PREPARATION OF CORPORATE REPRESENTATIVE FOR TRIAL TESTIMONY.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

COX CD	06/14/23	1.80	1	REVISE TRIAL STIPULATION (1.2); AND COMMUNICATIONS WITH G. WYATT AND D. PRIETO (JONES DAY) (0.6).
COX CD	06/14/23	1.60	1	DRAFT TRIAL STIPULATION (1.2); AND ANALYZE EXPERT REPORTS AND DEPOSITION TESTIMONY RE: SAME (0.4).
DAVIDSON J	06/14/23	2.00	1	PREPARE FOR (0.4) AND MEET WITH WITNESS (1.6).
DAVIDSON J	06/14/23	1.50	1	REVISE OPPOSITION TO PLAINTIFF'S TRIAL BRIEF.
EINSTEIN J *	06/14/23	5.20	1	ATTENTION TO TRIAL TO PROVIDE SUPPORT FOR EXPERT CROSS-EXAMINATION (4.2). ASSIST WITH PREPARATION FOR CLOSING (1.0).
FLEET I	06/14/23	4.90	1	TRAVEL HOME FROM TRIAL SITE.
FLEET I	06/14/23	0.40	1	COMMUNICATION WITH A. BRIER RE: WITNESS DIRECT PREP.
GALLAGHER P	06/14/23	0.80	1	REVISE DIRECTED VERDICT MOTION.
GALLAGHER P	06/14/23	5.20	1	RESEARCH IN CONNECTION WITH DIRECTED VERDICT MOTION.
KARP AM	06/14/23	6.90	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
KARP AM	06/14/23	2.00	1	ASSIST WITH PREPARATION FOR EXPERT CROSS.
LEIBOVITZ A	06/14/23	15.80	1	MAINTAIN OPERATIVE EXHIBIT SET (5.2); ASSIST WITH PREPARATION OF EXPERT CROSS EXAMINATION (7.2); CIRCULATE KEY PLEADINGS (0.2); ASSIST WITH PREPARATION OF WITNESS DIRECT EXAMINATION (0.5); ASSIST WITH PREPARATION OF EXPERT CROSS EXAMINATION (0.2); ANALYZE KEY PLAINTIFF DOCUMENTS (2.5).
LOFFELMAN KL	06/14/23	4.50	1	FINALIZE OPPOSITION TO PLAINTIFF'S TRIAL BRIEF.
MAHADEVAN V	06/14/23	0.50	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN SE	06/14/23	11.10	1	ATTEND COURT TO PROVIDE SUPPORT FOR CONTINUED CROSS OF EXPERT (5.0); ASSIST WITH PREPARATION FOR CONTINUED EXPERT CROSSES (4.5); MAINTAIN TRIAL EXHIBITS (1.6).
MARTIN ZW	06/14/23	9.50	1	DRAFT OPP'N TO MOTION FOR ATTORNEY SANCTIONS.
MCCARTHY SR	06/14/23	0.50	1	REVIEW TRIAL TESTIMONY FOR SUSTAINED DEFENSE OBJECTIONS.
MULLALEY CI	06/14/23	14.40	1	PREPARE FOR EXPERT CROSS (13.7), ASSIST WITH STIPULATION (0.7).
RAUCCI AM	06/14/23	0.10	1	PROVIDE LANCET ARTICLE.
SCHWARTZ JM	06/14/23	9.20	1	DRAFT OPPOSITION TO PLAINTIFF'S MOTION FOR SANCTIONS.
SILVERSTEIN RA	06/14/23	0.10	1	REVIEW BRIEF ON MOTION TO EXCLUDE.
SILVERSTEIN RA	06/14/23	0.20	1	REVIEW SANCTIONS BRIEF.
SILVERSTEIN RA	06/14/23	0.20	1	RESEARCH RE: OPPOSING PLAINTIFF'S SANCTIONS MOTION.
TRANGLE AS	06/14/23	1.80	1	ANALYZE TRIAL TESTIMONY FOR DIRECTED VERDICT MOTION.
TRANGLE AS	06/14/23	3.80	1	RESEARCH IN CONNECTION WITH OPPOSITION TO PLAINTIFF'S TRIAL BRIEF.
WYATT GM	06/14/23	0.80	1	REVISE OPPOSITION TO MOTION FOR SANCTIONS.
WYATT GM	06/14/23	1.20	1	REVISE PROPOSED STIPULATION.
WYATT GM	06/14/23	0.30	1	REVISE EXPERT EXAMINATION OUTLINE.
WYATT GM	06/14/23	0.60	1	COMMUNICATION WITH PL.'S COUNSEL, D. PRIETO AND A. BROWN RE: PROPOSED STIPULATION.
WYATT GM	06/14/23	1.00	1	PREPARE FOR TRIAL.
WYATT GM	06/14/23	2.90	1	ATTEND TRIAL PROCEEDINGS.
WYATT GM	06/14/23	0.40	1	ANALYZE EXPERT DISCLOSURES.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	06/14/23	0.80	1	REVISE OPPOSITION TO MOTION FOR SANCTIONS.
ALEXANIAN L	06/15/23	2.10	1	REVISE ANALYSIS OF FACTUAL BACKGROUND MATERIALS (1.8); COMMUNICATE WITH C. COX RE: SAME (0.3).
BALZANO AJ	06/15/23	5.20	1	ATTEND COURT FOR EXPERT AND ANOTHER EXPERT TESTIMONY.
BALZANO AJ	06/15/23	1.00	1	EDIT EXPERT CROSS OUTLINE.
BERNARDO RT	06/15/23	0.30	1	CONFER WITH A. KARP RE WITNESS PREPARATION.
BERNARDO RT	06/15/23	0.40	1	CONFER INTERNALLY RE EXPERT PREPARATION.
BRIER A	06/15/23	3.50	1	ASSIST WITH DEPOSITION PREPARATION OF WITNESS.
BROWN AM	06/15/23	9.00	1	PREPARE FOR (2.2) AND ATTEND COURT (4.8) AND PREPARE FOR UPCOMING CROSS EXAMINATION OF EXPERT (2).
CARUSO JA*	06/15/23	7.30	1	PREPARE FOR (0.7) AND ATTEND COURT (4.8). PREPARE FOR WITNESS'S DIRECT EXAMINATION (1.2). PREPARE FOR EXPERT'S CROSS EXAMINATION (0.6).
COGSWELL S	06/15/23	1.00	1	CONTINUE TO REVIEW TESTIMONY FOR CLOSING ARGUMENTS.
COGSWELL S	06/15/23	6.00	1	PREPARE FOR CROSS EXAMINATION OF EXPERT (1.2); ATTEND COURT. (4.8).
COX CD	06/15/23	0.40	1	CONFER WITH L. ALEXANIAN RE: PREPARATION OF STIPULATIONS.
DAVIDSON J	06/15/23	1.00	1	REVIEW MATERIALS FOR WITNESS DIRECT.
EINSTEIN J *	06/15/23	5.30	1	ATTENTION TO TRIAL TO PROVIDE SUPPORT FOR EXPERT CROSS-EXAMINATION (2.5). ASSIST WITH PREPARATION FOR CLOSING (2.8).
FLEET I	06/15/23	9.80	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
KARP AM	06/15/23	4.20	1	ASSIST WITH PREPARATION FOR EXPERT CROSS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

KARP AM	06/15/23	0.60	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
LEIBOVITZ A	06/15/23	8.10	1	ATTEND/ASSIST AT DAILY TRIAL PROCEEDINGS (4.4); CIRCULATE KEY PLEADINGS (0.2); ASSIST WITH PREPARATION OF EXPERT CROSS EXAMINATION (1.0); ASSIST WITH PREPARATION OF EXPERT CROSS EXAMINATION (0.2); MAINTAIN OPERATIVE EXHIBITS (1.6); ATTENTION TO WAR ROOM LOGISTICS (0.7).
MARTIN SE	06/15/23	1.80	1	ASSIST WITH PREPARATION FOR CONTINUED CROSS EXAMINATION OF EXPERT (1.0) AND OF ANOTHER EXPERT (0.8).
MARTIN SE	06/15/23	7.40	1	TRAVEL FROM SFO TO NEWARK.
MARTIN ZW	06/15/23	0.10	1	DRAFT EMAIL TO G. WYATT RE: DIRECTED VERDICT MOTIONS.
MULLALEY CI	06/15/23	9.40	1	PREPARE FOR EXPERT CROSS (5.2), PREPARE FOR WITNESS DIRECT (4.2).
SILVERSTEIN RA	06/15/23	0.30	1	REVIEW TRIAL PROCEEDINGS FOR TRIAL BRIEF.
TRANGLE AS	06/15/23	2.30	1	ANALYZE TRIAL TESTIMONY FOR DIRECTED VERDICT MOTION.
WYATT GM	06/15/23	0.20	1	REVISE DIRECTED VERDICT MOTIONS.
WYATT GM	06/15/23	3.00	1	ATTEND TRIAL PROCEEDINGS.
WYATT GM	06/15/23	0.50	1	PREPARE FOR TRIAL.
WYATT GM	06/15/23	0.50	1	PREPARE FOR HEARING ON SANCTIONS MOTION.
BALZANO AJ	06/16/23	1.30	1	REVIEW DEPOSITION DESIGNATIONS.
BALZANO AJ	06/16/23	1.50	1	EDIT EXPERT CROSS OUTLINE.
BERNARDO RT	06/16/23	0.30	1	REVIEW MATERIALS IN CONNECTION WITH EXPERT ISSUE.
BERNARDO RT	06/16/23	0.60	1	CONFER WITH A. KARP RE WITNESS PREP.
BRIER A	06/16/23	3.30	1	ASSIST WITH WITNESS DIRECT EXAMINATION PREPARATION.



**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BRIER A	06/16/23	1.20	1	ASSIST WITH WITNESS DIRECT EXAMINATION PREPARATION.
BRIER A	06/16/23	2.00	1	ASSIST WITH WITNESS DIRECT EXAMINATION PREPARATION.
BROWN AM	06/16/23	2.00	1	PREPARE FOR UPCOMING CROSS EXAMINATION OF EXPERT.
CARUSO JA*	06/16/23	0.60	1	PREPARE FOR WITNESS'S DIRECT EXAMINATION.
EINSTEIN J *	06/16/23	0.70	1	ASSIST WITH PREPARATION FOR CLOSING.
FLEET I	06/16/23	3.30	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
GALLAGHER P	06/16/23	2.50	1	RESEARCH IN CONNECTION WITH DIRECTED VERDICT MOTION.
KARP AM	06/16/23	2.80	1	CONFER WITH R. BERNARDO, A. BROWN, AND V. MAHADEVAN REGARDING PREPARATION FOR WITNESS DIRECT.
KASPARIE AJ	06/16/23	0.60	1	RESEARCH IN CONNECTION WITH WITNESS DIRECT.
LOFFELMAN KL	06/16/23	0.60	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
MARTIN SE	06/16/23	1.10	1	ASSIST WITH PREPARATION FOR ANTICIPATED DIRECT EXAM OF WITNESS (0.3); PREPARE FOR CROSS OF EXPERT (0.8)..
MARTIN ZW	06/16/23	2.20	1	REVISE MOTION FOR DIRECTED VERDICT.
MULLALEY CI	06/16/23	3.70	1	PREPARE FOR EXPERT CROSS.
SILVERSTEIN RA	06/16/23	0.40	1	REVIEW TRIAL TESTIMONY FOR DIRECTED VERDICT MOTION.
TRANGLE AS	06/16/23	5.60	1	ANALYZE TRIAL TESTIMONY FOR DIRECTED VERDICT MOTION.
WYATT GM	06/16/23	0.10	1	COMMUNICATION WITH PLAINTIFF RE: PROPOSED STIPULATION.
WYATT GM	06/16/23	0.30	1	PREPARE FOR COURT HEARING.
WYATT GM	06/16/23	0.20	1	ANALYZE PLAINTIFF'S FILING ON WITNESS DESIGNATIONS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	06/16/23	0.30	1	COMMUNICATION WITH D. PRIETO (JONES DAY) RE: PLAINTIFFS' COUNTER PROPOSAL RE: STIPULATION.
WYATT GM	06/16/23	0.10	1	COMMUNICATION WITH PLAINTIFF RE: PROPOSED STIPULATION.
BROWN AM	06/17/23	2.50	1	PREPARE FOR UPCOMING CROSS EXAMINATION OF EXPERT.
CARUSO JA*	06/17/23	3.40	1	PREPARE FOR THE CROSS-EXAMINATION OF EXPERT.
DAVIDSON J	06/17/23	1.50	1	PREPARE FOR WITNESS EXAMINATION.
EINSTEIN J *	06/17/23	1.30	1	ASSIST WITH PREPARATION FOR EXPERT CROSS.
HENDERSON J	06/17/23	0.10	1	PROVIDE REQUESTED ARTICLES.
KARP AM	06/17/23	4.50	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
KASPARIE AJ	06/17/23	0.60	1	RESEARCH IN CONNECTION WITH WITNESS DIRECT.
LEIBOVITZ A	06/17/23	2.40	1	TRACK EVIDENCE AND MAINTAIN OPERATIVE EXHIBIT SET.
MAHADEVAN V	06/17/23	4.00	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
MARTIN SE	06/17/23	2.40	1	ASSIST WITH PREPARATION OF PAGE-LINE DESIGNATION REPORTS (0.5); CORRESPONDENCE RE: ADMITTED EVIDENCE (0.7); REVIEW ADMITTED EXHIBITS TRACKER (0.6); ASSIST WITH PREPARATION FOR EXPERT CROSS (0.6).
MULLALEY CI	06/17/23	8.80	1	PREPARE FOR EXHIBIT MEET AND CONFER (6.6), PREPARE FOR EXPERT CROSS (2.2).
WYATT GM	06/17/23	0.70	1	COMMUNICATION WITH J. SATTERLEY RE: PROPOSED STIPULATION.
WYATT GM	06/17/23	1.50	1	REVISE DIRECTED VERDICT MOTION.
BALZANO AJ	06/18/23	1.70	1	DRAFT PLAINTIFF CROSS EXAMINATION OUTLINE.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BALZANO AJ	06/18/23	4.00	1	EDIT EXPERT CROSS EXAMINATION OUTLINE.
BERNARDO RT	06/18/23	0.20	1	CONFER WITH L. SPIEGEL RE PREPARATION FOR WEILL DIRECT.
BERNARDO RT	06/18/23	2.10	1	REVIEW TESTIMONY IN CONNECTION WITH WITNESS PREP.
BRIER A	06/18/23	3.40	1	ASSIST WITH PREPARATION FOR WITNESS EXAMINATION.
BROWN AM	06/18/23	3.00	1	PREPARE FOR UPCOMING CROSS EXAMINATION OF EXPERT.
CARUSO JA*	06/18/23	8.90	1	PREPARE FOR CLOSING STATEMENT (5.6). PREPARE FOR EXPERT CROSS EXAMINATION (3.3).
DAVIDSON J	06/18/23	3.00	1	PREPARE FOR WITNESS EXAMINATION.
EINSTEIN J *	06/18/23	9.80	1	TRAVEL TO TRIAL SITE.
EINSTEIN J *	06/18/23	0.90	1	PREPARE FOR EXPERT CROSS-EXAMINATION.
GALLAGHER P	06/18/23	2.50	1	REVISE DIRECTED VERDICT MOTION.
KARP AM	06/18/23	1.90	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
LEIBOVITZ A	06/18/23	2.60	1	MAINTAIN OPERATIVE EXHIBIT SET.
MARTIN ZW	06/18/23	0.10	1	REVISE DIRECTED VERDICT BRIEF.
MULLALEY CI	06/18/23	10.50	1	PREPARE FOR EXPERT CROSS (4.3), PREPARE FOR MEET AND CONFER WITH PLAINTIFFS RE: EXHIBITS (6.2).
BALZANO AJ	06/19/23	5.80	1	EDIT EXPERT CROSS EXAMINATION OUTLINE.
BALZANO AJ	06/19/23	0.60	1	ASSIST WITH PREPARATION FOR EXPERT CROSS.
BALZANO AJ	06/19/23	6.30	1	ASSIST WITH PREPARATION FOR CLOSING.
BERNARDO RT	06/19/23	0.20	1	ASSIST WITH PREPARATION FOR EXPERT DIRECT.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BROWN AM	06/19/23	10.20	1	PREPARE FOR UPCOMING CROSS EXAMINATION OF EXPERT (8.2) AND PREPARE FOR DIRECT EXAMINATIONS (2).
CARUSO JA*	06/19/23	13.30	1	PREPARE FOR EXPERT'S CROSS-EXAMINATION (9.1). PREPARE FOR WITNESS'S DIRECT EXAMINATION (4.2).
COGSWELL S	06/19/23	1.00	1	PREPARE DEMONSTRATIVES FOR CLOSING ARGUMENTS.
COGSWELL S	06/19/23	2.50	1	ASSIST WITH PREPARATION FOR CLOSING. (2) PREPARE FOR CROSS EXAMINATION OF EXPERT. (0.5).
DAVIDSON J	06/19/23	5.00	1	PREPARE FOR WITNESS EXAMINATION.
EINSTEIN J *	06/19/23	14.00	1	PREPARE FOR EXPERT CROSS-EXAMINATION.
GALLAGHER P	06/19/23	0.40	1	REVISE DIRECTED VERDICT MOTION.
KARP AM	06/19/23	6.00	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
KASPARIE AJ	06/19/23	0.30	1	CALL WITH J. CARUSO REGARDING RESEARCH IN CONNECTION WITH WITNESS DIRECT.
LEIBOVITZ A	06/19/23	14.30	1	MAINTAIN OPERATIVE EXHIBIT SET (4.2); ASSIST WITH PREPARATION OF EXPERT CROSS EXAMINATION (7.5); CIRCULATE KEY PLEADINGS (0.2); ASSIST WITH PREPARATION OF WITNESS DIRECT EXAMINATION (2.4).
MARTIN SE	06/19/23	11.00	1	ASSIST WITH PREPARATION FOR CROSS OF EXPERT (9.2); COORDINATION WITH A. LEIBOVITZ AND K. MULLALEY RE: EXHIBIT TRACKING (1.8).
MARTIN SE	06/19/23	4.00	1	TRAVEL FROM NJ TO SFO.
MARTIN ZW	06/19/23	0.50	1	REVISE DIRECTED VERDICT MOTION.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MULLALEY CI	06/19/23	13.90	1	PREPARE FOR EXPERT CROSS (7.4), PREPARE FOR EXPERT DIRECT (1.0), PREPARE FOR WITNESS DIRECT (1.4), PREPARE FOR EXHIBIT MEET AND CONFER (4.1).
SCHWARTZ JM	06/19/23	0.80	1	REVIEW PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE.
SCHWARTZ JM	06/19/23	0.30	1	PARTICIPATE ON CALL WITH G. WYATT RE: PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE.
SCHWARTZ JM	06/19/23	0.40	1	PARTICIPATE ON CALL WITH R. SILVERSTEIN AND A. TRANGLE RE: ARGUMENT ON MOTION TO EXCLUDE.
SILVERSTEIN RA	06/19/23	0.60	1	REVIEW PLAINTIFFS' ADMITTED EXHIBITS AND TESTIMONY FOR DIRECTED VERDICT.
SILVERSTEIN RA	06/19/23	2.20	1	DRAFT RESPONSE TO PLAINTIFF'S TRIAL BRIEF.
SILVERSTEIN RA	06/19/23	0.40	1	SPEAK WITH A. TRANGLE AND J. SCHWARTZ CONCERNING TRIAL BRIEF.
TRANGLE AS	06/19/23	3.20	1	DRAFT OUTLINE IN PREPARATION FOR HEARING ON TRIAL BRIEF.
TRANGLE AS	06/19/23	2.40	1	REVISE AFFIRMATIVE WITNESS DESIGNATIONS.
TRANGLE AS	06/19/23	0.90	1	DRAFT OBJECTIONS TO WITNESS DESIGNATIONS.
WYATT GM	06/19/23	0.30	1	COMMUNICATION WITH J. SCHWARTZ AND Z. MARTIN RE: DIRECTED VERDICT BRIEFS.
WYATT GM	06/19/23	0.20	1	COMMUNICATION WITH A. TRANGLE RE: REVISING DESIGNATIONS OF WITNESS TESTIMONY.
WYATT GM	06/19/23	0.40	1	DRAFT OBJECTIONS TO WITNESS TESTIMONY.
WYATT GM	06/19/23	0.10	1	COMMUNICATION WITH J. SATTERLEY RE: PROPOSED STIPULATIONS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	06/19/23	0.20	1	COMMUNICATION WITH A. BROWN RE: TRIAL STRATEGY.
WYATT GM	06/19/23	0.80	1	COMMUNICATION WITH PLAINTIFF RE: OBJECTIONS TO EXHIBITS.
WYATT GM	06/19/23	0.20	1	REVISE AFFIRMATIVE DESIGNATIONS OF WITNESS.
WYATT GM	06/19/23	0.20	1	COMMUNICATION WITH B. KING RE: JURY INSTRUCTIONS.
BAGGETTA B	06/20/23	0.70	1	RESEARCH OPPOSITION TO PLAINTIFF'S TRIAL MOTION.
BALZANO AJ	06/20/23	7.20	1	EDIT EXPERT CROSS EXAMINATION OUTLINE.
BALZANO AJ	06/20/23	4.80	1	ASSIST WITH PREPARATION FOR CLOSING.
BALZANO AJ	06/20/23	2.60	1	ATTEND COURT FOR EXPERT'S DIRECT.
BERNARDO RT	06/20/23	0.30	1	CONFER WITH A. KARP RE WITNESS PREPARATION.
BERNARDO RT	06/20/23	1.30	1	ASSIST WITH WITNESS PREP.
BRADY PE	06/20/23	0.20	1	REVIEW HEARING TRANSCRIPT IN SUPPORT OF DIRECT VERDICT MOTION.
BROWN AM	06/20/23	16.50	1	PREPARE FOR (2.9) AND ATTEND TRIAL (4.1) AND PREPARE FOR UPCOMING CROSS EXAMINATION OF EXPERT (9.5).
CARUSO JA*	06/20/23	15.80	1	PREPARE FOR EXPERT'S CROSS- EXAMINATION (13.7). PREPARE FOR CLOSING (2.1).
COGSWELL S	06/20/23	0.20	1	REVIEW NEW MEDICAL RECORDS.
COGSWELL S	06/20/23	5.20	1	DRAFT DEMONSTRATIVES FOR CLOSING ARGUMENTS.
COGSWELL S	06/20/23	2.00	1	PREPARE FOR CLOSING ARGUMENTS.
COGSWELL S	06/20/23	0.30	1	PREPARE FOR CROSS-EXAMINATION OF EXPERT.
COGSWELL S	06/20/23	0.50	1	REVIEW TRIAL TRANSCRIPTS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

DAVIDSON J	06/20/23	0.60	1	CONFER WITH TRIAL TEAM RE BRIEFING ISSUES (0.4); AND REVISE TALKING POINTS (0.2).
EINSTEIN J *	06/20/23	15.90	1	PREPARE FOR EXPERT CROSS-EXAMINATION (14.7). ATTENTION TO TRIAL TO PROVIDE SUPPORT FOR CROSS-EXAMINATION (1.2).
GALLAGHER P	06/20/23	0.50	1	CORRESPONDENCE WITH J. DAVIDSON AND Z. MARTIN RE: DIRECTED VERDICT MOTION.
GALLAGHER P	06/20/23	0.50	1	REVISE DIRECTED VERDICT MOTION.
KARP AM	06/20/23	5.40	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
LEIBOVITZ A	06/20/23	16.20	1	MAINTAIN OPERATIVE EXHIBIT SET (7.2); ASSIST WITH PREPARATION OF EXPERT CROSS EXAMINATION (5.0); CIRCULATE KEY PLEADINGS (0.2); ASSIST WITH PREPARATION OF WITNESS DIRECT EXAMINATION (1.3); ATTENTION TO WAR ROOM LOGISTICS (0.8); PREPARE OPERATIVE WITNESS DESIGNATIONS AND EXHIBITS (1.7).
MARTIN SE	06/20/23	14.10	1	ATTEND TRIAL FOR EXPERT EXAMINATIONS (4.1); ASSIST WITH PREPARATION OF EXPERT CROSS EXAMINATION OUTLINES (10.1).
MARTIN ZW	06/20/23	8.00	1	DRAFT OPPOSITION TO TRIAL BRIEF (4.0), DRAFT OPPOSITION TO MOTION TO EXCLUDE (4.0).
MCCARTHY SR	06/20/23	1.50	1	REVIEW LTL TESTIMONY FOR REFERENCE TO VALADEZ AND ADMISSION OF BANKRUPTCY EVIDENCE.
MULLALEY CI	06/20/23	13.60	1	PREPARE FOR EXPERT CROSS (6.3), PREPARE FOR CLOSING (6.6), ASSIST WITH DRAFT RESPONSE TO PLAINTIFF'S MOTION IN LIMINE (0.7).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

SCHWARTZ JM	06/20/23	5.60	1	REVISE DRAFT TALKING POINTS ON ARGUMENT ON MOTION TO EXCLUDE.
SCHWARTZ JM	06/20/23	0.20	1	PARTICIPATE ON CALL WITH Z. MARTIN RE: POTENTIAL NEXT STEPS IN CONNECTION WITH ONGOING TRIAL.
SILVERSTEIN RA	06/20/23	0.60	1	REVISE TALKING POINTS FOR TRIAL BRIEF.
SILVERSTEIN RA	06/20/23	1.00	1	DRAFT RESPONSE TO PLAINTIFF'S TRIAL BRIEF.
SILVERSTEIN RA	06/20/23	0.40	1	READ TRIAL TRANSCRIPT FOR TRIAL BRIEF.
TRANGLE AS	06/20/23	3.00	1	RESEARCH CASE LAW FOR MOTION TO EXCLUDE.
BAGGETTA B	06/21/23	1.10	1	REVISE AND FINALIZE TRIAL BRIEF.
BALZANO AJ	06/21/23	3.50	1	DRAFT PLAINTIFF CROSS EXAMINATION OUTLINE.
BALZANO AJ	06/21/23	4.10	1	ASSIST WITH PREPARATION FOR EXPERT CROSS..
BALZANO AJ	06/21/23	4.60	1	ATTEND COURT FOR EXPERT CROSS.
BALZANO AJ	06/21/23	1.40	1	DRAFT CLOSING SLIDE DECK.
BERNARDO RT	06/21/23	4.30	1	ASSIST WITH WITNESS PREP (2.0) AND CONFER WITH A. KARP RE SAME (2.3).
BERNARDO RT	06/21/23	0.90	1	ASSIST WITH PREPARATION FOR EXPERT DIRECT.
BROWN AM	06/21/23	16.00	1	PREPARE FOR (0.7) AND ATTEND TRIAL (6.3) AND PREPARE FOR UPCOMING CONTINUED CROSS EXAMINATION OF EXPERT AND CLOSING (9).
CARUSO JA*	06/21/23	15.40	1	ATTEND COURT (2.7). PREPARE FOR THE POTENTIAL RE-CROSS OF EXPERT (6.5). PREPARE FOR CLOSING (3.2). RESEARCH EVIDENCE MATTERS (3.0).
COGSWELL S	06/21/23	1.00	1	REVIEW DEMONSTRATIVES FOR CLOSING ARGUMENTS.



**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

COGSWELL S	06/21/23	0.90	1	REVIEW NEW MEDICAL RECORDS.
DAVIDSON J	06/21/23	1.00	1	REVISE TRIAL BRIEF (0.6) AND RELATED COMMUNICATION WITH TRIAL TEAM (0.4).
EINSTEIN J *	06/21/23	17.70	1	ATTEND COURT FOR EXPERT CROSS-EXAMINATION (6.3). PREPARE FOR CLOSING (1.7). PREPARE FOR CROSS-EXAMINATION OF PLAINTIFF (0.5). PREPARE FOR POTENTIAL EXPERT RE-CROSS (7.1). REVIEW DESIGNATED WITNESS TESTIMONY TO BE PLAYED AT TRIAL (2.1).
GALLAGHER P	06/21/23	0.10	1	CORRESPONDENCE WITH Z. MARTIN REGARDING DIRECTED VERDICT MOTION.
GALLAGHER P	06/21/23	0.60	1	CORRESPONDENCE WITH A. TRANGLE REGARDING LEGAL RESEARCH FOR DIRECTED VERDICT MOTION.
KARP AM	06/21/23	7.00	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT (5.4); CONFER WITH R. BERNARDO, A. BROWN, C. MULLALEY AND J. CARUSO REGARDING SAME (1.6).
LEIBOVITZ A	06/21/23	14.60	1	MAINTAIN OPERATIVE EXHIBIT SET (12.2); CIRCULATE KEY PLEADINGS (0.2); PREPARE OPERATIVE WITNESS DESIGNATIONS AND EXHIBITS (2.2).
LOFFELMAN KL	06/21/23	1.30	1	REVISE TRIAL BRIEF.
MAHADEVAN V	06/21/23	0.60	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
MARTIN SE	06/21/23	10.80	1	PREPARE FOR CROSS OF EXPERT (2.5); ATTEND COURT TO PROVIDE SUPPORT FOR CROSS OF EXPERT (3.0); ASSIST WITH PREPARATION FOR CLOSING (1.5); ASSIST WITH PREPARATION OF DEPOSITION DESIGNATIONS (1.3); ASSIST WITH PREPARATION FOR POTENTIAL CONTINUED EXPERT CROSS (2.5).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN ZW	06/21/23	9.20	1	REVISE TRIAL BRIEF (8.2), REVISE DIRECTED VERDICT MOTION (1.0).
MULLALEY CI	06/21/23	12.40	1	PREPARE FOR CLOSING (6.1), PREPARE FOR POSSIBLE EXPERT CROSS (4.2), ASSIST WITH TRIAL BRIEF (2.1).
SCHWARTZ JM	06/21/23	0.40	1	PARTICIPATE ON CALL WITH Z. MARTIN RE: TRIAL BRIEF.
SCHWARTZ JM	06/21/23	8.30	1	DRAFT TRIAL BRIEF.
SCHWARTZ JM	06/21/23	2.40	1	CONDUCT RESEARCH RE: TRIAL BRIEF.
SILVERSTEIN RA	06/21/23	0.20	1	REVIEW EMAILS REGARDING STIPULATION AND MEDICAL RECORDS.
TRANGLE AS	06/21/23	5.00	1	RESEARCH CASE LAW RE: TRIAL BRIEF.
TRANGLE AS	06/21/23	2.90	1	ANALYZE TRIAL TESTIMONY FOR USE IN DIRECTED VERDICT MOTION.
BALDWIN LA	06/22/23	0.10	1	TRIAL DOCKET.
BALZANO AJ	06/22/23	2.30	1	TEAM MEETING RE: CLOSING.
BALZANO AJ	06/22/23	0.70	1	EDIT PLAINTIFF CROSS EXAMINATION OUTLINE.
BALZANO AJ	06/22/23	5.00	1	ASSIST WITH PREPARATION FOR CLOSING.
BALZANO AJ	06/22/23	2.30	1	TEAM MEETING RE: CLOSING.
BERNARDO RT	06/22/23	0.30	1	ASSIST WITH PREPARATION FOR EXPERT DIRECT.
BERNARDO RT	06/22/23	7.20	1	PREPARE FOR WITNESS PREP (.70) AND WITNESS PREPARATION (6.5).
BRADY PE	06/22/23	1.50	1	RESEARCH IN CONNECTION WITH DIRECTED VERDICT MOTION.
BROWN AM	06/22/23	12.00	1	PREPARE FOR (1.8) AND ATTEND TRIAL (4.2 ) AND PREPARE FOR CLOSING ARGUMENT (6).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

CARUSO JA*	06/22/23	16.10	1	ATTENTION TO COURT PROCEEDINGS (3.1). PREPARE FOR WITNESS'S DIRECT EXAMINATION (4.2). PREPARE FOR CLOSING (3.7). ANALYZE PLAINTIFF'S PROPOSED EXHIBIT ADMISSIONS FOR OBJECTIONS (5.1).
EINSTEIN J *	06/22/23	12.20	1	PREPARE FOR CLOSING (7.1). ANALYZE DESIGNATED WITNESS TESTIMONY TO BE PLAYED AT TRIAL (3.1). TRIAL TEAM MEETING (2.0).
GALLAGHER P	06/22/23	2.00	1	RESEARCH IN CONNECTION WITH DIRECTED VERDICT MOTION.
GALLAGHER P	06/22/23	1.50	1	REVISE DIRECTED VERDICT MOTION.
KARP AM	06/22/23	9.10	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
LEIBOVITZ A	06/22/23	18.00	1	MAINTAIN OPERATIVE EXHIBIT SET IN CONNECTION WITH 6/23 HEARING (15.2); CIRCULATE KEY PLEADINGS (0.1); PREPARE OPERATIVE WITNESS DESIGNATIONS AND EXHIBITS (2.9).
MARTIN SE	06/22/23	11.60	1	ASSIST WITH PREPARATION FOR VIDEO DESIGNATIONS (1.2); ASSIST WITH PREPARATION FOR WITNESS DIRECT EXAM (2.4); ATTENTION TO TRIAL SITE AND WAR ROOM LOGISTICS (1.6); ASSIST WITH PREPARATION OF ADMITTED EXHIBITS (6.4).
MARTIN ZW	06/22/23	2.40	1	REVISE DIRECTED VERDICT MOTION (2.0), REVISE TRIAL BRIEF (0.4).
MULLALEY CI	06/22/23	19.10	1	PREPARE FOR MEET AND CONFER WITH PLAINTIFFS' REGARDING EXHIBITS (6.9), PREPARE FOR CLOSING (9.9), PREPARE FOR WITNESS DIRECT (2.3).
ST. AMAND A	06/22/23	0.60	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

TRANGLE AS	06/22/23	3.30	1	ANALYZE TRIAL TESTIMONY FOR DIRECTED VERDICT MOTION.
BALZANO AJ	06/23/23	1.60	1	ASSIST WITH PREPARATION FOR PLAINTIFF CROSS.
BALZANO AJ	06/23/23	5.40	1	DRAFT CLOSING SLIDE DECK.
BRADY PE	06/23/23	0.30	1	RESEARCH IN CONNECTION WITH DIRECTED VERDICT MOTION.
BROWN AM	06/23/23	11.00	1	PREPARE FOR AND ATTEND HEARING ON EXHIBITS.
CARUSO JA*	06/23/23	11.20	1	PREPARE FOR WITNESS'S DIRECT EXAMINATION (7.3). PREPARE FOR CLOSING (3.9).
DAVIDSON J	06/23/23	1.00	1	REVISE DIRECTED VERDICT MOTION.
EINSTEIN J *	06/23/23	10.00	1	PREPARE FOR WITNESS DIRECT (1.7). PREPARE FOR CLOSING (8.3).
GALLAGHER P	06/23/23	2.60	1	REVISE DIRECTED VERDICT MOTION.
GALLAGHER P	06/23/23	1.20	1	DRAFT DIRECTED VERDICT MOTION.
LEIBOVITZ A	06/23/23	9.40	1	MAINTAIN OPERATIVE EXHIBIT SET IN CONNECTION WITH 6/23 HEARING (6.9); PREPARE OPERATIVE WITNESS DESIGNATIONS AND EXHIBITS (2.5).
MARTIN SE	06/23/23	12.70	1	ASSIST WITH PREPARATION OF PAGE-LINE DESIGNATIONS (1.4); ASSIST WITH PREPARATION FOR CLOSING (1.3); ASSIST WITH COMPILING EVIDENCE (4.7); CONFER WITH A. BROWN, K. MULLALEY AND A. LEIBOVITZ RE: SAME (3.6); ATTENTION TO TRIAL SITE LOGISTICS (1.7).
MARTIN ZW	06/23/23	4.50	1	REVISE DIRECTED VERDICT BRIEF (2.0), LEGAL RESEARCH EXPERT BRIEF (2.5).
MULLALEY CI	06/23/23	0.80	1	PREPARE FOR HEARING REGARDING EXHIBITS (0.8).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

SCHWARTZ JM	06/23/23	2.20	1	CONDUCT RESEARCH RE: OPPOSITION TO PLAINTIFF'S MOTION TO EXCLUDE.
SCHWARTZ JM	06/23/23	0.40	1	PARTICIPATE ON CALL WITH Z. MARTIN AND R. SILVERSTEIN RE: RESPONDING TO PLAINTIFF'S MOTION TO EXCLUDE.
SILVERSTEIN RA	06/23/23	3.00	1	RESEARCH CASE LAW CONCERNING TRIAL TESTIMONY.
SILVERSTEIN RA	06/23/23	0.20	1	SPEAK WITH Z. MARTIN CONCERNING RESEARCH FOR WITNESS DIRECT.
SILVERSTEIN RA	06/23/23	0.30	1	SPEAK WITH J. SCHWARTZ AND Z. MARTIN REGARDING TRIAL TESTIMONY RESEARCH FOR DIRECTED VERDICT MOTION.
TRANGLE AS	06/23/23	1.80	1	RESEARCH CASE LAW FOR DIRECTED VERDICT MOTION.
TRANGLE AS	06/23/23	0.90	1	AMEND AFFIRMATIVE DESIGNATIONS FOR WITNESS TESTIMONY.
TRANGLE AS	06/23/23	5.70	1	ANALYZE TRIAL TESTIMONY FOR DIRECTED VERDICT MOTION.
WYATT GM	06/23/23	0.40	1	DRAFT RESPONSES TO PROPOSED JURY INSTRUCTIONS.
BALZANO AJ	06/24/23	5.40	1	EDIT CLOSING SLIDE DECK.
BALZANO AJ	06/24/23	3.40	1	ASSIST WITH PREPARATION FOR PLAINTIFF CROSS.
BROWN AM	06/24/23	12.00	1	PREPARE FOR UPCOMING DIRECT EXAMINATION OF WITNESS (9.0) AND PREPARE FOR CLOSING ARGUMENT (3.0).
CARUSO JA*	06/24/23	10.90	1	PREPARE FOR WITNESS'S DIRECT EXAMINATION (8.8). PREPARE FOR CLOSING (2.1).
DAVIDSON J	06/24/23	1.00	1	REVISE DIRECTED VERDICT MOTION.
EINSTEIN J *	06/24/23	9.90	1	PREPARE FOR CLOSING.
GALLAGHER P	06/24/23	0.50	1	REVISE DIRECTED VERDICT MOTION.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

LEIBOVITZ A	06/24/23	8.80	1	MAINTAIN OPERATIVE EXHIBIT SET (7.5); ASSIST WITH PREPARATION OF WITNESS DIRECT EXAMINATION (1.1); ASSIST WITH PREPARATION OF CLOSING ARGUMENTS (0.2).
MARTIN SE	06/24/23	7.80	1	ASSIST WITH TRIAL SITE LOGISTICS (1.2); ASSIST WITH PREPARATION OF EVIDENCE (6.6).
WYATT GM	06/24/23	6.60	1	DRAFT BRIEF ON JURY INSTRUCTIONS.
WYATT GM	06/24/23	1.90	1	DRAFT RESPONSE TO PLAINTIFF RE: WITNESS DESIGNATION AMENDMENTS.
BALZANO AJ	06/25/23	6.80	1	EDIT CLOSING SLIDE DECK.
BALZANO AJ	06/25/23	2.80	1	ASSIST WITH PREPARATION FOR EXPERT CROSS.
BALZANO AJ	06/25/23	0.50	1	REVIEW PLAINTIFF'S DEPOSITION DESIGNATIONS.
BALZANO AJ	06/25/23	2.70	1	REVIEW DIRECTED VERDICT MOTION.
BROWN AM	06/25/23	16.00	1	PREPARE FOR DIRECT EXAMINATION OF WITNESS (13) AND PREPARE FOR CROSS EXAMINATION OF PLAINTIFF, EMORY VALADEZ (3).
CARUSO JA*	06/25/23	14.00	1	PREPARE FOR WITNESS'S DIRECT EXAMINATION (11.2). PREPARE FOR CLOSING (2.8).
COGSWELL S	06/25/23	5.50	1	REVIEW ADDITIONAL PRIOR EXPERT TESTIMONY.
DAVIDSON J	06/25/23	1.00	1	REVISE DIRECTED VERDICT MOTION.
EINSTEIN J *	06/25/23	14.20	1	PREPARE FOR CLOSING.
KARP AM	06/25/23	1.70	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
KASPARIE AJ	06/25/23	0.20	1	CORRESPOND WITH A. BROWN, G. WYATT, AND J. CARUSO RE: RESEARCH IN CONNECTION WITH PLAINTIFF'S MOTION TO EXCLUDE.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

LEIBOVITZ A	06/25/23	11.00	1	TRACK EVIDENCE AND MAINTAIN OPERATIVE EXHIBIT SET (6.4); ASSIST WITH PREPARATION OF WITNESS DIRECT EXAMINATION (1.0); CIRCULATE AND MANAGE KEY PLEADINGS (0.2); ASSIST WITH PREPARATION OF PLAINTIFF CROSS EXAMINATION (3.1); ASSIST WITH PREPARATION OF OPPOSITION TO MOTION TO EXCLUDE WITNESS TESTIMONY (0.3).
MARTIN SE	06/25/23	12.30	1	ASSIST WITH PREPARATION FOR FACT WITNESS TESTIMONY (2.6); ASSIST WITH PREPARATION FOR WITNESS EXAMINATION (7.2); ATTENTION TO TRIAL SITE LOGISTICS (1.1); ASSIST WITH REVIEW OF ADMITTED EVIDENCE (1.4).
MARTIN ZW	06/25/23	0.60	1	LEGAL RESEARCH TO PREPARE OPP'N TO MOTION TO EXCLUDE.
SCHWARTZ JM	06/25/23	2.30	1	DRAFT OPPOSITION TO PLAINTIFF'S MOTION TO EXCLUDE.
SILVERSTEIN RA	06/25/23	4.60	1	RESEARCH CASE LAW FOR OPPOSITION TO PLAINTIFF'S MOTION TO EXCLUDE.
TRANGLE AS	06/25/23	3.60	1	RESEARCH CASE LAW FOR MOTION IN LIMINE.
WINSHIP CJ*	06/25/23	7.40	1	RESEARCH RE: POTENTIAL MOTION IN CONNECTION WITH CLOSING ARGUMENTS.
WYATT GM	06/25/23	5.90	1	ANALYZE PLAINTIFF'S DISCLOSURES FOR OBJECTIONS.
WYATT GM	06/25/23	1.00	1	ANALYZE COURT RULINGS ON WITNESS DESIGNATIONS.
WYATT GM	06/25/23	0.70	1	DRAFT BRIEF RE: JURY INSTRUCTIONS.
WYATT GM	06/25/23	3.30	1	REVISE DIRECTED VERDICT BRIEFS.
WYATT GM	06/25/23	0.90	1	ANALYZE RESEARCH RE: TRIAL STRATEGY.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	06/25/23	1.00	1	COMMUNICATION WITH PLAINTIFF'S COUNSEL RE: DESIGNATION AMENDMENTS.
BAGGETTA B	06/26/23	2.30	1	REVISE MOTION FOR DIRECTED VERDICT.
BAGGETTA B	06/26/23	1.40	1	FINALIZE OPPOSITION TO PLAINTIFF'S TRIAL BRIEF.
BALZANO AJ	06/26/23	8.00	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
BALZANO AJ	06/26/23	7.80	1	EDIT CLOSING SLIDE DECK.
BERNARDO RT	06/26/23	0.90	1	CONFER W/J. SCHWARTZ, A. KARP, A. ST. AMAND RE WITNESS PREP.
BROWN AM	06/26/23	16.50	1	PREPARE FOR (1.2) AND ATTEND TRIAL (5.8) AND PREPARE FOR UPCOMING DIRECT EXAMINATION OF WITNESS (9.5).
CARUSO JA*	06/26/23	15.20	1	PREPARE FOR WITNESS'S DIRECT EXAMINATION (12.9). PREPARE FOR CLOSING (2.3).
COGSWELL S	06/26/23	0.30	1	REVIEW NEW MEDICAL RECORDS.
COGSWELL S	06/26/23	1.00	1	SUMMARIZE PRIOR TRANSCRIPTS.
DAVIDSON J	06/26/23	3.00	1	REVISE TRIAL BRIEF (0.9) AND MOTION FOR DIRECTED VERDICT (1.2); ANDCONFER W/G. WYATT RE: SAME (0.9).
EINSTEIN J *	06/26/23	16.60	1	PREPARE FOR CLOSING.
GALLAGHER P	06/26/23	2.50	1	REVIEW TRIAL TRANSCRIPTS FOR DIRECTED VERDICT MOTION.
GALLAGHER P	06/26/23	1.10	1	RESEARCH IN CONNECTION WITH DIRECTED VERDICT MOTION.
GALLAGHER P	06/26/23	0.10	1	CORRESPONDENCES WITH J. SCHWARTZ AND A. TRANGLE REGARDING MOTION TO EXCLUDE.
GALLAGHER P	06/26/23	1.40	1	REVISE DIRECTED VERDICT MOTION (1.1); CONFER WITH J. DAVIDSON, G. WYATT, J. SCHWARTZ AND Z. MARTIN REGARDING THE SAME (0.3).



**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

KARP AM	06/26/23	3.70	1	CORRESPONDENCE WITH R. BERNARDO, A. BROWN AND J. CARUSO REGARDING PREPARATION FOR WITNESS DIRECT.
KARP AM	06/26/23	0.20	1	CONFER WITH S. COGSWELL REGARDING PREPARATION OF CLOSING.
KASPARIE AJ	06/26/23	0.60	1	RESEARCH IN CONNECTION WITH WITNESS DIRECT.
LEIBOVITZ A	06/26/23	16.00	1	MAINTAIN OPERATIVE EXHIBIT SET (6.8); ASSIST WITH PREPARATION OF WITNESS DIRECT EXAMINATION (4.8); CIRCULATE KEY PLEADINGS (0.1); ASSIST WITH PREPARATION OF OPPOSITION TO MOTION TO EXCLUDE (0.8); ASSIST WITH PREPARATION OF CLOSING ARGUMENTS (3.5).
LIU W	06/26/23	1.80	1	ASSIST WITH REVIEW OF BACKGROUND OF PLAINTIFF'S TRIAL EXHIBIT.
LOFFELMAN KL	06/26/23	4.90	1	REVISE MOTION FOR DIRECTED VERDICT.
LOFFELMAN KL	06/26/23	4.20	1	REVISE OPPOSITION TO PLAINTIFF'S MOTION TO EXCLUDE.
MARTIN SE	06/26/23	16.40	1	ASSIST WITH PREPARATION FOR FACT WITNESS TESTIMONY (1.2); ASSIST WITH PREPARATION FOR WITNESS'S TESTIMONY (13.0); ASSIST WITH REVIEW OF ADMITTED EVIDENCE (2.2).
MARTIN ZW	06/26/23	3.40	1	RESEARCH OPPOSITION TO PLAINTIFF'S MOTION TO EXCLUDE (2.9), REVISE DIRECTED VERDICT MOTION (0.5).
SCHWARTZ JM	06/26/23	12.70	1	DRAFT OPPOSITION TO PLAINTIFF'S MOTION TO EXCLUDE.
SCHWARTZ JM	06/26/23	0.20	1	PARTICIPATE ON CALL WITH R. BERNARDO RE: WITNESS TRIAL PREP.
SILVERSTEIN RA	06/26/23	0.80	1	DRAFT TRIAL BRIEF.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

SILVERSTEIN RA	06/26/23	2.80	1	RESEARCH FOR TRIAL BRIEF.
ST. AMAND A	06/26/23	0.10	1	CALL WITH R. BERNARDO RE: WITNESS DIRECT.
ST. AMAND A	06/26/23	2.30	1	REVIEW DOCUMENTS IN PREPARATION FOR WITNESS DIRECT.
ST. AMAND A	06/26/23	0.30	1	CONFER WITH J. SCHWARTZ, J. DAVIDSON, G. WYATT AND S. MARTIN RE: PREPARATION FOR WITNESS DIRECT.
TRANGLE AS	06/26/23	0.70	1	ANALYZE TRIAL TESTIMONY FOR OPPOSITION TO PLAINTIFF'S TRIAL BRIEF.
TRANGLE AS	06/26/23	1.50	1	ANALYZE TRIAL EXHIBITS FOR OPPOSITION TO PLAINTIFF'S TRIAL BRIEF.
TRANGLE AS	06/26/23	0.30	1	RESEARCH CASE LAW FOR OPPOSITION TO TRIAL BRIEF. ANALYZE TRIAL TESTIMONY FOR OPPOSITION TO PLAINTIFF'S TRIAL.
WYATT GM	06/26/23	1.20	1	PREPARE FOR ARGUMENT ON MOTIONS.
WYATT GM	06/26/23	3.20	1	PREPARE FOR ARGUMENT ON JURY INSTRUCTIONS.
WYATT GM	06/26/23	1.60	1	REVISE OPPOSITION TO MOTION TO EXCLUDE.
WYATT GM	06/26/23	1.70	1	ANALYZE PLAINTIFF EXHIBITS MOVED FOR ADMISSION.
WYATT GM	06/26/23	5.80	1	ATTEND TRIAL PROCEEDINGS.
WYATT GM	06/26/23	1.90	1	PREPARE FOR DIRECTED VERDICT ARGUMENTS.
BAGGETTA B	06/27/23	1.90	1	FINALIZE MOTION FOR DIRECTED VERDICT.
BALZANO AJ	06/27/23	16.60	1	EDIT CLOSING SLIDE DECK.
BERNARDO RT	06/27/23	0.40	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
BERNARDO RT	06/27/23	0.40	1	ADDRESS FACTUAL ISSUE IN CONNECTION WITH WITNESS TESTIMONY.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BROWN AM	06/27/23	16.80	1	PREPARE FOR (0.9) AND ATTEND TRIAL (6.1) AND PREPARE FOR UPCOMING CONTINUED EXAMINATION OF WITNESS AND CLOSING ARGUMENT (9.8).
CARUSO JA*	06/27/23	16.60	1	ATTEND WITNESS'S DIRECT EXAMINATION (5.5). PREPARE FOR WITNESS'S CROSS-EXAMINATION AND RE-DIRECT EXAMINATION (7.1). PREPARE FOR CLOSING (4.0).
COGSWELL S	06/27/23	3.10	1	OBSERVE TRIAL TESTIMONY.
EINSTEIN J *	06/27/23	18.00	1	PREPARE FOR CLOSING.
GALLAGHER P	06/27/23	1.10	1	REVISE DIRECTED VERDICT MOTION (0.7), REVIEW LEGAL RESEARCH CONDUCTED FOR THE SAME (0.2), AND COMMUNICATION WITH G. WYATT REGARDING THE SAME (0.2).
KARP AM	06/27/23	0.30	1	CONFER WITH R. BERNARDO AND J. CARUSO REGARDING PREPARATION OF WITNESS FOR TRIAL.
LEIBOVITZ A	06/27/23	16.80	1	MAINTAIN OPERATIVE EXHIBIT SET (6.2); ASSIST WITH PREPARATION OF WITNESS DIRECT EXAMINATION (7.5); CIRCULATE KEY PLEADINGS (0.2); ASSIST WITH PREPARATION OF EXPERT DIRECT EXAMINATION (0.2); ASSIST WITH PREPARATION OF MOTION FOR DIRECTED VERDICT (0.2); ASSIST WITH PREPARATION OF CLOSING ARGUMENTS (2.5).
LOFFELMAN KL	06/27/23	3.40	1	REVISE MOTION FOR DIRECTED VERDICT.
MARTIN SE	06/27/23	15.50	1	ATTEND COURT TO PROVIDE SUPPORT FOR PROCEEDINGS (5.0); ASSIST WITH REVIEW OF ADMITTED EVIDENCE (2.3); ASSIST WITH CONTINUED EXAMINATION OF WITNESS (5.1); ASSIST WITH PREPARATION FOR CLOSING STATEMENTS (3.1).

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

MARTIN ZW	06/27/23	0.30	1	REVISE DIRECTED VERDICT DRAFT BRIEFS.
TRANGLE AS	06/27/23	0.70	1	RESEARCH IN CONNECTION WITH TRIAL BRIEF.
WYATT GM	06/27/23	1.80	1	ATTEND COURT FOR JURY INSTRUCTIONS.
WYATT GM	06/27/23	0.50	1	COMMUNICATION WITH S. RICHMAN RE: STRATEGY FOR EXPERT DIRECT EXAMINATION.
WYATT GM	06/27/23	4.10	1	REVISE DIRECTED VERDICT MOTION.
WYATT GM	06/27/23	6.10	1	ATTEND TRIAL PROCEEDINGS.
WYATT GM	06/27/23	2.20	1	PREPARE FOR ARGUMENT ON JURY INSTRUCTIONS.
BALZANO AJ	06/28/23	5.80	1	EDIT CLOSING SLIDE DECK.
BALZANO AJ	06/28/23	4.40	1	ATTEND PROCEEDINGS FOR EXPERT AND WITNESS.
BERNARDO RT	06/28/23	0.40	1	ASSIST WITH PREPARATION FOR WITNESS DIRECT.
BROWN AM	06/28/23	13.00	1	PREPARE FOR (1.9) AND ATTEND TRIAL (5.1) AND PREPARE FOR CLOSING (6).
CARUSO JA*	06/28/23	10.60	1	PREPARE FOR THE CROSS-EXAMINATION AND RE-DIRECT OF WITNESS (10.1). PREPARE FOR CLOSING (0.5).
COGSWELL S	06/28/23	0.20	1	REVIEW NEW MEDICAL RECORDS.
COGSWELL S	06/28/23	1.90	1	REVIEW NEW MEDICAL RECORDS.OBSERVE TRIAL TESTIMONY.
CONNER TL	06/28/23	0.10	1	LOCATE REQUESTED LETTER BY JEFFREY BRENT.
EINSTEIN J *	06/28/23	11.80	1	PREPARE FOR CLOSING.
GALLAGHER P	06/28/23	2.40	1	DRAFT DIRECTED VERDICT MOTION.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

LEIBOVITZ A	06/28/23	12.20	1	MAINTAIN OPERATIVE EXHIBIT SET (4.9); ASSIST WITH PREPARATION OF WITNESS DIRECT EXAMINATION (6.5); ASSIST WITH PREPARATION OF CLOSING ARGUMENTS (0.8).
MARTIN SE	06/28/23	12.40	1	ASSIST WITH PREPARATION FOR CONTINUED TESTIMONY OF WITNESS (4.4); ATTEND COURT TO PROVIDE SUPPORT FOR PROCEEDINGS (5.0); ASSIST WITH TRIAL SITE LOGISTICS (1.2); ASSIST WITH REVIEW OF ADMITTED EVIDENCE (1.8).
MARTIN ZW	06/28/23	1.00	1	REVISE DIRECTED VERDICT BRIEF.
MCNULTY PA	06/28/23	0.30	1	REVIEW AND ADDRESS TRIAL REQUEST FOR AER INFORMATION.
SILVERSTEIN RA	06/28/23	0.20	1	READ TRIAL TRANSCRIPT FOR TRIAL BRIEF.
SILVERSTEIN RA	06/28/23	0.20	1	REVIEW MOTION FOR DIRECTED VERDICT.
TRANGLE AS	06/28/23	3.30	1	ANALYZE TRIAL TESTIMONY IN CONNECTION WITH DIRECTED VERDICT MOTION.
TRANGLE AS	06/28/23	1.30	1	ANALYZE EVIDENCE IN CONNECTION WITH DIRECTED VERDICT MOTION.
TRANGLE AS	06/28/23	1.30	1	RESEARCH IN CONNECTION WITH DIRECTED VERDICT MOTION.
WYATT GM	06/28/23	2.20	1	PREPARE FOR ARGUMENT ON JURY INSTRUCTIONS.
WYATT GM	06/28/23	2.00	1	ATTEND HEARING ON JURY INSTRUCTIONS.
WYATT GM	06/28/23	1.60	1	REVISE DRAFT JURY INSTRUCTIONS.
WYATT GM	06/28/23	2.10	1	ATTEND TRIAL PROCEEDINGS.
WYATT GM	06/28/23	2.00	1	MEET WITH TRIAL TEAM RE: STRATEGY.
WYATT GM	06/28/23	2.80	1	ANALYZE DRAFT LONG FORM JURY INSTRUCTIONS.
BALZANO AJ	06/29/23	1.50	1	REVIEW TRIAL TRANSCRIPTS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BALZANO AJ	06/29/23	3.70	1	OBSERVE TRIAL PROCEEDINGS RE: WITNESS, JURY INSTRUCTIONS.
BROWN AM	06/29/23	8.50	1	PREPARE FOR (1.1) AND ATTEND TRIAL (5.9) AND PREPARE FOR CLOSING (1.5).
CARUSO JA*	06/29/23	5.50	1	PREPARE FOR (1.2) AND ATTEND (4.3) WITNESS'S CROSS-EXAMINATION AND RE-DIRECT.
COGSWELL S	06/29/23	3.00	1	OBSERVE TRIAL TESTIMONY PRIOR TO JURY INSTRUCTIONS.
EINSTEIN J *	06/29/23	4.00	1	ATTENTION TO TRIAL PROCEEDINGS.
GALLAGHER P	06/29/23	1.80	1	CONDUCT LEGAL RESEARCH IN SUPPORT OF AND DRAFT MOTION FOR DIRECTED VERDICT (1.6), AND CONFER WITH G. WYATT REGARDING THE SAME (0.2).
LEIBOVITZ A	06/29/23	10.00	1	TRAVEL HOME FROM TRIAL SITE.
LEIBOVITZ A	06/29/23	4.90	1	MAINTAIN OPERATIVE EXHIBIT SET (4.0); ASSIST WITH PREPARATION OF WITNESS REDIRECT EXAMINATION (0.8); ATTENTION TO WAR ROOM LOGISTICS (0.1).
MARTIN SE	06/29/23	8.00	1	TRAVEL FROM SAN FRANCISCO TO NEWARK.
MARTIN SE	06/29/23	7.50	1	ASSIST WITH PREPARATION FOR CONTINUED CROSS OF WITNESS (2.0); ATTEND COURT TO PROVIDE SUPPORT FOR WITNESS CROSS (5.0); ATTENTION TO TRIAL LOGISTICS (0.5).
MARTIN ZW	06/29/23	0.20	1	CONFER WITH G. WYATT & P. GALLAGHER RE: DIRECTED VERDICT MOTION.
SILVERSTEIN RA	06/29/23	0.30	1	READ TRIAL TRANSCRIPT FOR TRIAL BRIEF.
TRANGLE AS	06/29/23	1.30	1	RESEARCH CASE LAW FOR DIRECTED VERDICT MOTION.
TRANGLE AS	06/29/23	3.70	1	ANALYZE TESTIMONY FOR DIRECTED VERDICT MOTION..

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	06/29/23	0.30	1	COMMUNICATION WITH TRIAL TEAM RE: STRATEGY FOR EXHIBITS AND JURY INSTRUCTIONS.
WYATT GM	06/29/23	5.90	1	ATTEND THE TRIAL.
WYATT GM	06/29/23	0.30	1	PREPARE FOR OBJECTIONS ON JURY INSTRUCTIONS.
WYATT GM	06/29/23	0.90	1	REVISE JURY INSTRUCTIONS.
BALZANO AJ	06/30/23	11.90	1	TRAVELING FROM TRIAL SITE TO BACK HOME.
CARUSO JA*	06/30/23	7.10	1	TRAVEL HOME FROM TRIAL SITE.
EINSTEIN J *	06/30/23	9.80	1	TRAVEL HOME FROM TRIAL SITE.
GALLAGHER P	06/30/23	2.70	1	REVISE DRAFT OF MOTION FOR DIRECTED VERDICT WITH NEW TRIAL TESTIMONY.
TRANGLE AS	06/30/23	3.60	1	ANALYZE TRIAL TESTIMONY FOR USE IN DIRECTED VERDICT MOTION.
WYATT GM	06/30/23	0.70	1	REVISE DRAFT PROFFER RE: RULINGS AND EVIDENCE.
WYATT GM	06/30/23	0.10	1	ANALYZE RULINGS ON MOTIONS IN LIMINE.

\* Law clerks are law school graduates who are not presently admitted to practice.

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES  
ATTORNEY WORK PRODUCT  
PRIVILEGED AND CONFIDENTIAL

**Valadez Flat Fee Time Detail for July 1, 2023 - July 11, 2023**

**CLIENT:** 690970 LTL Management LLC  
**MATTER:** 8 Bankruptcy

NAME	DATE	HOURS	TASK	DESCRIPTION
1) Litigation Consulting				
MARTIN ZW	07/01/23	0.20	1	(ANTHONY VALADEZ) REVISE DIRECTED VERDICT MOTION.
GALLAGHER P	07/02/23	0.40	1	(ANTHONY VALADEZ) REVISE DRAFT OF MOTION FOR DIRECTED VERDICT (0.3), AND CORRESPOND WITH G. WYATT REGARDING THE SAME (0.1).
BROWN AM	07/03/23	10.00	1	(ANTHONY VALADEZ) EDIT CLOSING SLIDE DECK.
CARUSO JA	07/03/23	0.80	1	(ANTHONY VALADEZ) PREPARE FOR CLOSING.
LEIBOVITZ A	07/03/23	7.50	1	(ANTHONY VALADEZ) MAINTAIN OPERATIVE EXHIBIT SET IN CONNECTION WITH 7/5 HEARING.
MARTIN SE	07/03/23	1.00	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF EVIDENCE FOR JURY.
EINSTEIN J	07/04/23	2.40	1	(ANTHONY VALADEZ) PREPARE FOR CLOSING.
LEIBOVITZ A	07/04/23	3.30	1	(ANTHONY VALADEZ) MAINTAIN OPERATIVE EXHIBIT SET IN CONNECTION WITH 7/5 REVIEW OF PLAINTIFF'S EXHIBITS.
MARTIN SE	07/04/23	2.50	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF EVIDENCE FOR JURY.
BAGGETTA B	07/05/23	0.50	1	(ANTHONY VALADEZ) FINALIZE TRIAL BRIEF.
BALZANO AJ	07/05/23	13.90	1	(ANTHONY VALADEZ) EDIT CLOSING DECK.
BROWN AM	07/05/23	10.00	1	(ANTHONY VALADEZ) EDIT CLOSING POWERPOINT.
CARUSO JA	07/05/23	9.80	1	(ANTHONY VALADEZ) PREPARE FOR CLOSING.



**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

DAVIDSON J	07/05/23	1.30	1	(ANTHONY VALADEZ) REVISE BRIEF ON CLOSING ARGUMENTS.
EINSTEIN J	07/05/23	11.10	1	(ANTHONY VALADEZ) PREPARE FOR CLOSING.
GALLAGHER P	07/05/23	5.70	1	(ANTHONY VALADEZ) CONDUCT LEGAL RESEARCH RE: DIRECTED VERDICT BRIEFING (4.0); CONFER WITH J. DAVIDSON AND G. WYATT REGARDING THE SAME (0.7) AND REVISE DRAFT OF THE SAME (1.0).
LEIBOVITZ A	07/05/23	13.20	1	(ANTHONY VALADEZ) MAINTAIN OPERATIVE EXHIBIT SET IN CONNECTION WITH 7/6 HEARING (12.6); ASSIST WITH PREPARATION FOR CLOSING ARGUMENTS (0.7); CIRCULATE KEY PLEADINGS (0.1).
LOFFELMAN KL	07/05/23	0.80	1	(ANTHONY VALADEZ) REVISE DEFENDANTS' TRIAL BRIEF.
MARTIN SE	07/05/23	7.00	1	(ANTHONY VALADEZ) ASSIST WITH FINALIZATION OF EVIDENCE FOR JURY (4.5); ASSIST WITH CLOSING PRESENTATION (2.5).
MARTIN ZW	07/05/23	0.80	1	(ANTHONY VALADEZ) REVISE DIRECTED VERDICT MOTION.
TRANGLE AS	07/05/23	3.00	1	(ANTHONY VALADEZ) RESEARCH CALIFORNIA LAW ON POST TRIAL MOTIONS.
WYATT GM	07/05/23	0.20	1	(ANTHONY VALADEZ) REVISE TRIAL BRIEF.
WYATT GM	07/05/23	0.30	1	(ANTHONY VALADEZ) COMMUNICATION WITH M. REID RE: INDEX OF EXHIBITS.
WYATT GM	07/05/23	0.40	1	(ANTHONY VALADEZ) CALL WITH S. MARTIN, A. LEIBOVITZ, AND B. KING RE: LIST OF JURY EXHIBITS.
WYATT GM	07/05/23	0.10	1	(ANTHONY VALADEZ) COMMUNICATION WITH P. GALLAGHER RE: DRAFT TRIAL BRIEF.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	07/05/23	0.70	1	(ANTHONY VALADEZ) DRAFT TALKING POINTS RE: JURY INSTRUCTION OBJECTIONS.
WYATT GM	07/05/23	0.60	1	(ANTHONY VALADEZ) REVISE DIRECTED VERDICT MOTION.
BALZANO AJ	07/06/23	10.30	1	(ANTHONY VALADEZ) EDIT CLOSING DECK.
BALZANO AJ	07/06/23	1.30	1	(ANTHONY VALADEZ) MEETING RE: CLOSING.
BROWN AM	07/06/23	9.00	1	(ANTHONY VALADEZ) EDIT CLOSING POWERPOINT.
CARUSO JA	07/06/23	10.30	1	(ANTHONY VALADEZ) PREPARE FOR CLOSING.
EINSTEIN J	07/06/23	8.10	1	(ANTHONY VALADEZ) PREPARE FOR CLOSING.
LEIBOVITZ A	07/06/23	12.60	1	(ANTHONY VALADEZ) MAINTAIN OPERATIVE EXHIBIT SET IN CONNECTION WITH 7/7 HEARING (12.3); ASSIST WITH PREPARATION FOR CLOSING ARGUMENTS (0.3).
MARTIN SE	07/06/23	10.30	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION FOR CLOSING (2.3); COORDINATION WITH A. BALZANO AND A. BROWN RE: SAME (1.2); ASSIST WITH FINALIZATION OF EVIDENCE FOR JURY (4.4); COORDINATION WITH A. LEIBOVITZ RE: SAME (2.0).
WYATT GM	07/06/23	0.10	1	(ANTHONY VALADEZ) COMMUNICATION WITH A. BROWN, S. MARTIN AND A. LEIBOVITZ RE: REDACTED EXHIBITS.
WYATT GM	07/06/23	2.30	1	(ANTHONY VALADEZ) PREPARE FOR ARGUMENT RE: JURY INSTRUCTIONS, VERDICT FORM AND EXHIBITS.
WYATT GM	07/06/23	7.20	1	(ANTHONY VALADEZ) ATTEND HEARING ON JURY INSTRUCTIONS, VERDICT FORM, AND EXHIBITS.
BALZANO AJ	07/07/23	10.10	1	(ANTHONY VALADEZ) REVISE CLOSING DECK.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BROWN AM	07/07/23	8.00	1	(ANTHONY VALADEZ) EDIT CLOSING POWERPOINT.
CARUSO JA	07/07/23	10.80	1	(ANTHONY VALADEZ) PREPARE FOR CLOSING.
EINSTEIN J	07/07/23	11.20	1	(ANTHONY VALADEZ) PREPARE FOR CLOSING.
GALLAGHER P	07/07/23	1.70	1	(ANTHONY VALADEZ) RESEARCH REGARDING DIRECTED VERDICT BRIEFING.
LEIBOVITZ A	07/07/23	9.40	1	(ANTHONY VALADEZ) FINALIZE EVIDENCE FOR THE JURY (8.8); ASSIST WITH PREPARATION FOR CLOSING ARGUMENTS (0.5); CIRCULATE KEY PLEADINGS (0.1).
MARTIN SE	07/07/23	7.70	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF EVIDENCE FOR TRIAL (2.1); ASSIST WITH CLOSING PRESENTATION (5.6).
TRANGLE AS	07/07/23	3.00	1	(ANTHONY VALADEZ) RESEARCH REGARDING POST-TRIAL BRIEFS.
WYATT GM	07/07/23	0.80	1	(ANTHONY VALADEZ) COMMUNICATION WITH COURT AND OPPOSING COUNSEL RE: REVISIONS TO JURY VERDICT FORM.
WYATT GM	07/07/23	0.30	1	(ANTHONY VALADEZ) RESEARCH REGARDING ANTICIPATED POST-TRIAL BRIEFING.
WYATT GM	07/07/23	0.30	1	(ANTHONY VALADEZ) COMMUNICATION WITH S. MARTIN RE: EXHIBITS ISSUES.
WYATT GM	07/07/23	1.00	1	(ANTHONY VALADEZ) PREPARE FOR HEARING ON EXHIBITS AND VERDICT FORM.
WYATT GM	07/07/23	3.20	1	(ANTHONY VALADEZ) ATTEND HEARING ON EXHIBITS AND VERDICT FORM.
WYATT GM	07/07/23	0.20	1	(ANTHONY VALADEZ) COMMUNICATION WITH TRIAL TEAM RE: PLAINTIFF'S EXHIBITS IN EVIDENCE.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

WYATT GM	07/07/23	0.10	1	(ANTHONY VALADEZ) COMMUNICATION WITH P. GALLAGHER AND A. TRIANGLE RE: DRAFT REPLY BRIEF IN SUPPORT OF TRIAL BRIEF.
BALZANO AJ	07/08/23	3.20	1	(ANTHONY VALADEZ) REVISE CLOSING SLIDE DECK.
BROWN AM	07/08/23	6.00	1	(ANTHONY VALADEZ) PREPARE FOR CLOSING (5.0); AND EDIT DECK FOR THE SAME (2.0).
CARUSO JA	07/08/23	7.80	1	(ANTHONY VALADEZ) PREPARE FOR CLOSING.
EINSTEIN J	07/08/23	10.60	1	(ANTHONY VALADEZ) PREPARE FOR CLOSING.
LEIBOVITZ A	07/08/23	13.70	1	(ANTHONY VALADEZ) FINALIZE EVIDENCE FOR THE JURY (12.2); ASSIST WITH PREPARATION FOR CLOSING ARGUMENTS (1.4); CIRCULATE KEY PLEADINGS (0.1).
MARTIN SE	07/08/23	3.00	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF CLOSING PRESENTATION.
MARTIN ZW	07/08/23	0.50	1	(ANTHONY VALADEZ) DRAFT EMAIL MEMO TO A. TRANGLE RE: REPLY IN SUPPORT OF TRIAL BRIEF.
TRANGLE AS	07/08/23	0.10	1	(ANTHONY VALADEZ) DISCUSSION WITH G. WYATT RE: REPLY IN SUPPORT OF TRIAL BRIEF.
TRANGLE AS	07/08/23	5.60	1	(ANTHONY VALADEZ) DRAFT REPLY TRIAL BRIEF.
WYATT GM	07/08/23	0.70	1	(ANTHONY VALADEZ) ANALYZE OPPOSITION TO TRIAL BRIEF (0.5); COMMUNICATION WITH A. TRANGLE RE: SAME (0.2).
WYATT GM	07/08/23	0.20	1	(ANTHONY VALADEZ) COMMUNICATION WITH A. BALZANO RE: PREPARATION OF CLOSING.
WYATT GM	07/08/23	0.60	1	(ANTHONY VALADEZ) COMMUNICATION WITH COURT RE: ADMISSIBILITY OF EXHIBITS.
BALZANO AJ	07/09/23	18.30	1	(ANTHONY VALADEZ) REVISE CLOSING DECK.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BROWN AM	07/09/23	17.00	1	(ANTHONY VALADEZ) EDIT CLOSING PRESENTATION (11.0); AND PREPARE FOR THE SAME (6.0).
CARUSO JA	07/09/23	18.40	1	(ANTHONY VALADEZ) PREPARE FOR CLOSING.
EINSTEIN J	07/09/23	18.20	1	(ANTHONY VALADEZ) PREPARE FOR CLOSING.
LEIBOVITZ A	07/09/23	12.80	1	(ANTHONY VALADEZ) FINALIZE EVIDENCE FOR THE JURY (7.9); ASSIST WITH PREPARATION FOR CLOSING ARGUMENTS (2.7); CIRCULATE KEY PLEADINGS (0.2); ASSIST WITH PREPARATION FOR EVIDENCE ISSUE (2.0).
MARTIN SE	07/09/23	13.30	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION OF EVIDENCE FOR JURY (3.2); ASSIST WITH PREPARATION FOR CLOSING (10.1).
WYATT GM	07/09/23	1.20	1	(ANTHONY VALADEZ) REVISE DIRECTED VERDICT MOTIONS.
WYATT GM	07/09/23	0.20	1	(ANTHONY VALADEZ) COMMUNICATION WITH A. BROWN RE: CLOSING STRATEGY.
WYATT GM	07/09/23	1.90	1	(ANTHONY VALADEZ) REVISE REPLY IN SUPPORT OF TRIAL BRIEF.
WYATT GM	07/09/23	0.40	1	(ANTHONY VALADEZ) REVISE TRIAL BRIEF.
WYATT GM	07/09/23	1.00	1	(ANTHONY VALADEZ) PREPARE FOR ARGUMENT RE: CLOSING ARGUMENTS.
WYATT GM	07/09/23	1.20	1	(ANTHONY VALADEZ) PREPARE FOR ARGUMENT ON DIRECTED VERDICT MOTIONS.
BALZANO AJ	07/10/23	3.90	1	(ANTHONY VALADEZ) EDIT CLOSING DECK.
BALZANO AJ	07/10/23	5.90	1	(ANTHONY VALADEZ) ATTEND CLOSING ARGUMENTS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

BROWN AM	07/10/23	10.50	1	(ANTHONY VALADEZ) PREPARE FOR (5.4) AND ATTEND (5.1) COURT FOR CLOSING ARGUMENTS.
CARUSO JA	07/10/23	7.10	1	(ANTHONY VALADEZ) PREPARE FOR (2.0) AND SUPPORT (5.1) CLOSING ARGUMENT.
COGSWELL S	07/10/23	4.50	1	(ANTHONY VALADEZ) OBSERVE CLOSING ARGUMENTS.
EINSTEIN J	07/10/23	10.10	1	(ANTHONY VALADEZ) PREPARE FOR (5.2) AND ATTEND (4.9) CLOSING.
LEIBOVITZ A	07/10/23	4.40	1	(ANTHONY VALADEZ) ATTENTION TO CLOSING ARGUMENTS (4.0); ASSIST WITH PREPARATION OF EVIDENCE ISSUE (0.4).
MARTIN SE	07/10/23	8.40	1	(ANTHONY VALADEZ) ASSIST WITH PREPARATION FOR CLOSING STATEMENTS (3.4); ATTEND AND PROVIDE SUPPORT FOR CLOSING STATEMENTS (5.0).
WYATT GM	07/10/23	1.40	1	(ANTHONY VALADEZ) PREPARE FOR ARGUMENT ON DIRECTED VERDICT.
WYATT GM	07/10/23	5.80	1	(ANTHONY VALADEZ) ATTEND THE TRIAL.
WYATT GM	07/10/23	0.20	1	(ANTHONY VALADEZ) ANALYZE RESEARCH RE: POST-TRIAL MATTERS.
WYATT GM	07/10/23	0.10	1	(ANTHONY VALADEZ) REVISE PROFFER OF EVIDENCE.
BROWN AM	07/11/23	8.00	1	(ANTHONY VALADEZ) ATTEND DELIBERATIONS (7.2) AND FOLLOW UP REGARDING THE SAME (0.8).
CARUSO JA	07/11/23	8.10	1	(ANTHONY VALADEZ) ATTENTION TO JURY DELIBERATIONS AND QUESTIONS.
EINSTEIN J	07/11/23	5.00	1	(ANTHONY VALADEZ) ATTENTION TO JURY DELIBERATIONS AND POTENTIAL JURY QUESTIONS.

**SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES**  
**ATTORNEY WORK PRODUCT**  
**PRIVILEGED AND CONFIDENTIAL**

LEIBOVITZ A	07/11/23	5.60	1	(ANTHONY VALADEZ) MANAGE KEY TRIAL TRANSCRIPTS (0.5); MANAGE EVIDENCE (2.3); ASSIST WITH PREPARATION OF EVIDENCE ISSUE (2.8).
MARTIN SE	07/11/23	7.00	1	(ANTHONY VALADEZ) ASSIST WITH BREAKDOWN OF TRIAL SITE.
WYATT GM	07/11/23	2.00	1	(ANTHONY VALADEZ) ATTEND THE TRIAL.